Appendix 1A

July 2020 Delta Conveyance Project Scoping Summary Report and Addenda

DELTA CONVEYANCE PROJECT
SCOPING SUMMARY REPORT

PREPARED FOR:

California Department of Water Resources
901 P Street
Sacramento, CA 95814
Contact: Marcus Yee, Program Manager
Marcus.Yee@water.ca.gov

PREPARED BY:

ICF
980 Ninth Street, Suite 1200
Sacramento, CA 95814
Contact: Stefanie Lyster
Stefanie.Lyster@icf.com

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Acronyms and Abbreviations

BDCP	Bay Delta Conservation Plan
CEQA	California Environmental Quality Act
COVID-19	coronavirus disease 2019
CVP	Central Valley Project
DWR	California Department of Water Resources
EIR	Environmental Impact Report
NEPA	National Environmental Policy Act
NOP	Notice of Preparation
SWP	State Water Project

Chapter 1
Introduction

This document is the Scoping Summary Report for the Delta Conveyance Project (project). The California Department of Water Resources (DWR) is undertaking an environmental review process to evaluate impacts of the project as required by the California Environmental Quality Act (CEQA). The proposed project would construct and operate new conveyance facilities in the Delta that would add to the existing State Water Project (SWP) infrastructure. New intake facilities as points of diversion would be located in the north Delta along the Sacramento River between Freeport and the confluence with Sutter Slough. The new conveyance facilities would include a tunnel to convey water from the new intakes to the existing Banks Pumping Plant and potentially the federal Jones Pumping Plant in the south Delta.

The project underwent a public scoping period of 93 days from January 15, 2020 to April 17, 2020, where DWR accepted public comments on the scope of issues to be considered in the Environmental Impact Report (EIR) that will be prepared for the project. Eight scoping meetings were held throughout the state to provide information on the project and gather comments. The scoping period was originally scheduled for a period of 65 days ending on March 20, 2020 but was extended for an additional 28 days in response to stakeholder requests and to accommodate unprecedented circumstances related to the coronavirus disease 2019 (COVID-19) pandemic. During this period, the public was invited to participate in the earliest phase of the environmental review process and DWR accepted public comments on the proposed project.

This Scoping Summary Report provides background on the project, summarizes the environmental review process, describes the purpose of scoping, and discusses specific activities and public outreach efforts undertaken during the public scoping period. It also summarizes comments received during the scoping period and discusses how the scoping comments will be considered during the development of the EIR. Copies of notifications and materials developed during the scoping period are included as appendices to this report, as are copies of all comments received during the scoping process. Supplemental material attached to comment letters is not provided in the appendices but is available upon request.

1.1 Environmental Review Process

DWR is the lead state agency preparing an EIR to examine the potential environmental effects of the project in compliance with CEQA.

DWR previously studied two similar projects, the Bay Delta Conservation Plan (BDCP) and California WaterFix. This project is a new project and is not supplemental to BDCP or California WaterFix and is not tiered from previous environmental compliance documents. Nevertheless, based on prior experience, the project's EIR will include the suite of resource categories contained in Appendix G of CEQA Guidelines, thus, an initial study would be superfluous.

An EIR is required under CEQA because the project may result in significant effects to some resource areas. The EIR will analyze environmental resources that could be affected by the project as outlined in Appendix G of the CEQA Guidelines. DWR will also evaluate a reasonable range of alternatives that

are potentially feasible and meet most of the project objectives, and would avoid or reduce one or more potentially significant impacts of the proposed project. In addition, the EIR will also include an analysis of the No Project Alternative.

DWR released a Notice of Preparation (NOP) for the project on January 15, 2020 pursuant to CEQA Guidelines Section 15082, which was provided to federal agencies and other potential responsible and trustee agencies (Appendix A).

The NOP stated that the project will also involve federal agencies that must comply with the National Environmental Policy Act (NEPA), likely requiring the preparation of an environmental impact statement (EIS). The NOP identified that the Federal agencies with roles with respect to the project may include approvals or permits issued by the Bureau of Reclamation (Reclamation) and United States Army Corps of Engineers. However, as of the writing of this report, no federal lead agency has been established.

1.2 Purpose of Scoping

Scoping is the earliest phase of the environmental review process in which the public is invited to participate. Scoping is also the beginning stage of developing an environmental document under CEQA; it is an opportunity for stakeholders, agencies and the general public to provide comments about what the lead agency should consider when preparing the EIR. The information gathered during scoping is used to help identify the range of project alternatives to be studied, potentially affected geographical areas, resources that may be affected by the project, and the extent of impact assessments, along with recommended mitigation, minimization and avoidance measures.

1.2.1 CEQA Scoping Requirements

1.2.1.1 How Scoping Begins

Scoping begins with the state lead agency (in this case, DWR) filing an NOP with both the California Office of Planning and Research and with the county clerk in each county where the project would be located or where a possible effect could occur as a result of the proposed project. The state lead agency must provide an NOP to Responsible and Trustee Agencies and to involved federal agencies per CEQA Guidelines Section 15082(a). In addition to the required noticing, DWR provided notice of the scoping period to the public in the following ways: publishing the NOP in a newspaper of general circulation, posting the NOP both onsite, offsite, and near the area where the project will be located, and directly mailing to property owners and occupants in or adjacent to the project area.

Required Meeting Notices

Per CEQA Section 21083.9(a)(2) and Guidelines Section 15082(c)(1), the lead agency must hold at least one meeting to address scope and content of the EIR for projects of statewide, region-wide or area-wide significance.

Per PRC 21083.9 (b), the lead agency must also provide notice of a scoping meeting (or meetings) to the following groups.

- Any county or city that borders on a county or city where the project will be located, unless otherwise designated annually by agreement between the state lead agency and the county or city
- Any responsible agency
- Any public agency that has jurisdiction by law with respect to the project
- A transportation planning agency or public agency required to be consulted pursuant to CEQA Section 21092.4.
- Any public agency, organization or individual who has filed a written request for the notice

1.2.1.2 Benefits of Early Scoping Consultation

CEQA encourages lead agencies to conduct early public consultation prior to completing a draft EIR. These requirements apply to all projects undertaken or funded, or those projects requiring issuance of a permit by a public agency.

CEQA's basic purpose is to inform governmental decision-makers and the public about the potential environmental effects of a project, or about actions they can take regarding those potential effects, as described below.

- Potential significant environmental effects of proposed project activities
- To require changes in projects through adoption of feasible alternatives that would avoid or significantly reduced environmental impacts
- To identify mitigation measures to avoid or substantially lessen potentially significant impacts
- To publicly disclose the reasons why a project was approved if significant and unavoidable environmental impacts may occur

Per CEQA Guidelines Section 15082, a state lead agency must consult early with federal agencies having jurisdictional authority over the project, with responsible agencies, and with trustee agencies responsible for resources that may be affected by the project. Within 30 days of receiving a project NOP, responsible and trustee agencies must provide comments to the state lead agency with specific information about scope and the content of environmental information related to their respective areas of statutory authority.

Agencies may also consult early with anyone the agency believes will have concerns about the environmental impacts of a project. This early consultation is also called scoping. The CEQA Guidelines state that early scoping "has been helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and eliminating from detailed study issues found not to be important."

CEQA Guidelines Section 15083 further states that "[s]coping has been found to be an effective way to bring together and resolve the concerns of affected federal, state, and local agencies, and proponents of the action, and other interested persons including those who might not be in accord with the action on environmental grounds."

1.3 Project Overview

This section describes the project, including the purpose and project objectives. It also describes proposed project facilities.

1.3.1 Purpose and Project Objectives

The purpose of the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of SWP water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta consistent with the State's Water Resilience Portfolio in a cost-effective manner.

The objectives of the project are:

- To address anticipated rising sea levels and other reasonably foreseeable consequences of climate change and extreme weather events.
- To minimize the potential for public health and safety impacts from reduced quantity and quality of SWP water deliveries, and potentially CVP water deliveries, south of the Delta resulting from a major earthquake that causes breaching of Delta levees and the inundation of brackish water into the areas in which the existing SWP and CVP pumping plants operate in the southern Delta.
- To protect the ability of the SWP, and potentially the CVP, to deliver water when hydrologic conditions result in the availability of sufficient amounts, consistent with the requirements of state and federal law, including the California and federal Endangered Species Acts and Delta Reform Act, as well as the terms and conditions of water delivery contracts and other existing applicable agreements.
- To provide operational flexibility to improve aquatic conditions in the Delta and better manage risks of further regulatory constraints on SWP operations.

1.3.2 Description of Proposed Project Facilities

The existing SWP Delta water conveyance facilities, which include Clifton Court Forebay and the Banks Pumping Plant in the south Delta, enable DWR to divert water and lift it into the California Aqueduct. The proposed project would construct and operate new conveyance facilities in the Delta that would add to the existing SWP infrastructure. New intake facilities as points of diversion would be located in the north Delta along the Sacramento River between Freeport and the confluence with Sutter Slough. The new conveyance facilities would include a tunnel to convey water from the new intakes to the existing Banks Pumping Plant and potentially the federal Jones Pumping Plant in the south Delta. The new facilities would provide an alternate location for diversion of water from the Delta and would be operated in coordination with the existing south Delta pumping facilities, resulting in a system also known as "dual conveyance" because there would be two complementary methods to divert and convey water. New facilities proposed for the project include, but are not limited to, the following:

- Intake facilities on the Sacramento River
- Tunnel reaches and tunnel shafts
- Forebays

- Pumping plant
- South Delta Conveyance Facilities

Figure 1 shows the areas under consideration for these facilities. Other ancillary facilities may be constructed to support construction of the conveyance facilities including, but not limited to, access roads, barge unloading facilities, concrete batch plants, fuel stations, mitigation areas, and power transmission and/or distribution lines.

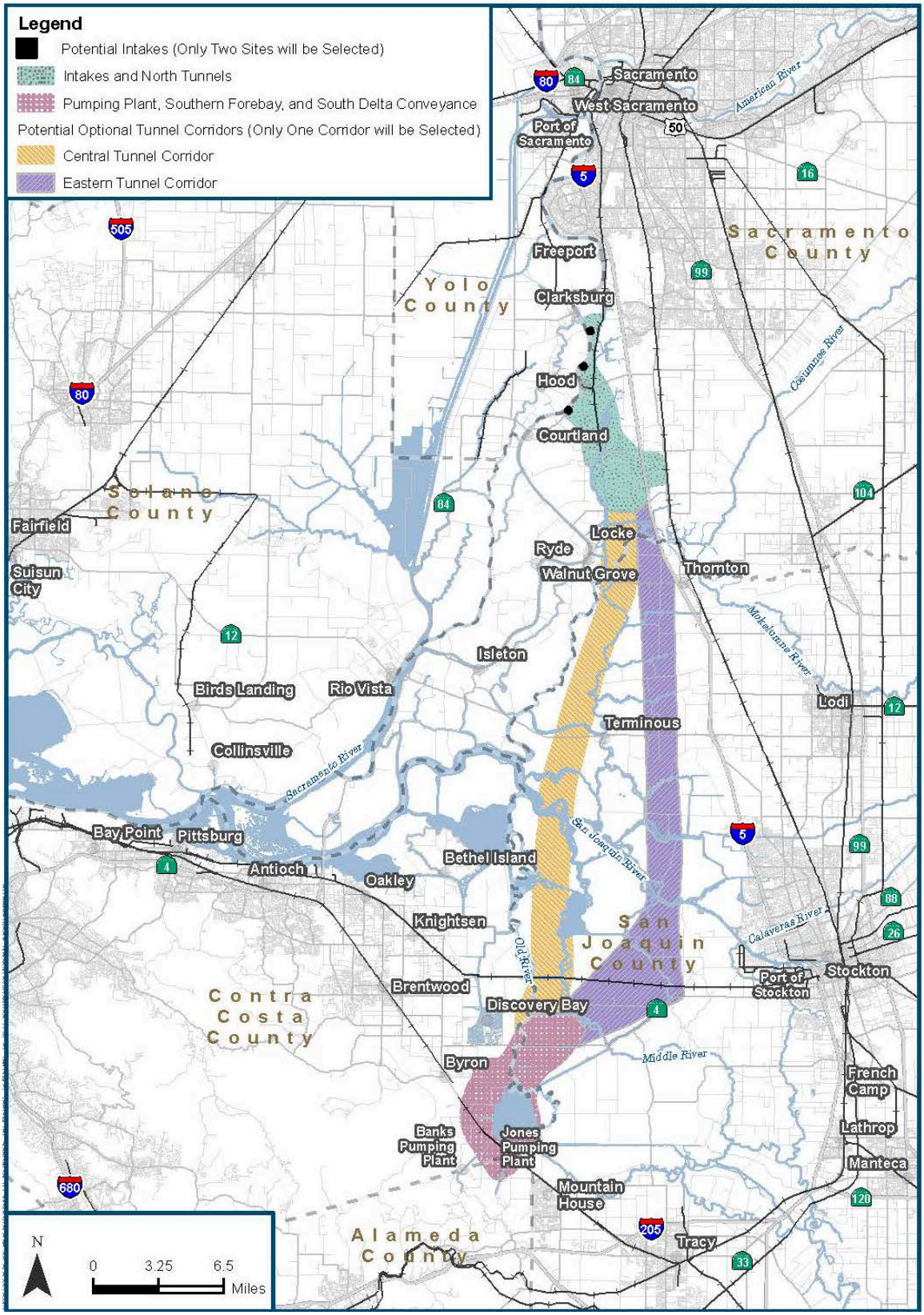


Figure 1. Proposed Project Facility Corridor Options

Under the proposed project, the new north Delta facilities would be sized to convey up to 6,000 cubic feet per second (cfs) of water from the Sacramento River to the SWP facilities in the south Delta. DWR would operate the proposed north Delta facilities and the existing south Delta facilities in compliance with all state and federal regulatory requirements and would not reduce DWR's current ability to meet standards in the Delta to protect biological resources and water quality for beneficial uses. Operations of the conveyance facilities are proposed, among other reasons, to increase DWR's ability to capture water during high flow events. Although initial operating criteria of the proposed project would be formulated during the preparation of the upcoming Draft EIR in order to assess potential environmental impacts and mitigation, final project operations would be determined after completion of the CEQA process, completing the consultation and review requirements of the federal Endangered Species Act, compliance with the California Endangered Species Act. DWR will file a petition for a change of point of diversion and the State Water Resources Control Board (SWRCB) will hold a hearing to determine the impacts to public trust and other legal users of water that may occur from the Delta Conveyance Project. Construction and commissioning of the overall conveyance project, if approved, would take approximately 13 years, but the duration of construction at most locations would vary and would not extend for this full construction period.

The U.S. Department of the Interior's Bureau of Reclamation closely coordinates CVP operations with DWR's SWP operations. Because of this, alternatives to the proposed project in the EIR may include connection to the existing Jones Pumping Plant in the south Delta, along with having a portion of the overall capacity dedicated for CVP use. In addition, some of the alternatives may accommodate CVP use of available capacity (when not used by SWP participants).

1.3.2.1 Intake Facilities

The proposed intake facilities would be located along the Sacramento River between Freeport and the confluence with Sutter Slough, as shown in Figure 1. The proposed project would include two intakes with a maximum diversion capacity of about 3,000 cfs each. The size of each intake location could range from 75 to 150 acres, depending upon fish screen selection, along the Sacramento River and include a state-of-the-art fish screen, sedimentation basins, tunnel shaft, and ancillary facilities. An additional 40 to 60 acres at each intake location would be temporarily disturbed for staging of construction facilities, materials storage, and a concrete batch plant, if needed.

1.3.2.2 Tunnel and Tunnel Shafts

The proposed project would construct up to two north connecting tunnel reaches to connect the intakes to an Intermediate Forebay (see "Forebays" section below), a single main tunnel from the Intermediate Forebay to a new Southern Forebay, and two connecting south tunnel reaches as part of the proposed project's South Delta Conveyance Facilities (see "South Delta Conveyance Facilities" section below) to connect to the existing SWP and, potentially CVP, facilities in the south Delta. The single main tunnel would follow one of two potential optional corridors as shown in Figure 1. The proposed single main tunnel and connecting tunnel reaches would be constructed underground with the bottom of the tunnel at approximately 190 feet below the ground surface. Construction for the tunnel would require a series of launch shafts and retrieval shafts. Each launch and retrieval shaft site would require a permanent area of about four acres. Launch sites would involve temporary use of up to about 400 acres for construction staging and material storage. Depending on the location, the shafts may also require flood protection facilities to extend up to about 45 feet above the existing ground surface to avoid water from entering the tunnel from the ground surface if the area was flooded. Earthen material would be removed from below the ground surface as tunnel

construction progresses; this reusable tunnel material could be reused for embankments or other purposes in the Delta or stored near the launch shaft locations.

1.3.2.3 Forebays

The proposed project would include an Intermediate Forebay and a Southern Forebay. The Intermediate Forebay would provide potential operational benefits and would be located along the tunnel corridor between the intakes and the pumping plant. The Southern Forebay would be located at the southern end of the single main tunnel and would facilitate conveyance to the existing SWP pumping facility and, potentially the CVP pumping facilities. The forebays would be constructed above the ground, and not within an existing water body. The size of the Intermediate Forebay would be approximately 100 acres with an additional 150 acres disturbed during construction for material and equipment storage, and reusable tunnel material storage. The embankments would be approximately 30 feet above the existing ground surface. Additional appurtenant structures, including a permanent crane, would extend up to 40 feet above the embankments. The Southern Forebay would be located near the existing Clifton Court Forebay and would be approximately 900 acres with an additional 200 acres disturbed during construction for material and equipment storage, potential loading and offloading facilities, and reusable tunnel material storage. The Southern Forebay embankments would be up to 30 feet above the existing ground surface.

1.3.2.4 Pumping Plant

The proposed project would include a pumping plant located at the new Southern Forebay and would receive the water through the single main tunnel for discharge in the Southern Forebay. The pumping plant would be approximately 25 acres along the side of the Southern Forebay and would include support structures, with a permanent crane for maintenance as the highest feature that would extend approximately 70 feet above the existing ground surface. The temporary and permanent disturbed area for the pumping plant is included in the Southern Forebay area, described above.

1.3.2.5 South Delta Conveyance Facilities

The proposed project would include South Delta Conveyance Facilities that would extend from the new Southern Forebay to the existing Banks Pumping Plant inlet channel. The connection to the existing Banks Pumping Plant would be via canals with two tunnels to cross under the Byron Highway. The canals and associated control structures would be located over approximately 125 to 150 acres. Approximately 40 to 60 additional acres would be disturbed temporarily during construction. These facilities could also be used to connect the Southern Forebay to the CVP's Jones Pumping Plant.

Chapter 2
Public Scoping Efforts

Project scoping took place from January 15, 2020, to April 17, 2020. The scoping period was originally scheduled for 65 days ending on March 20, 2020 but was extended for an additional 28 days per the request of stakeholders to allow for additional time to review project information, and to accommodate unprecedented circumstances related to the COVID-19 pandemic. During this period, the public was invited to participate in the scoping process, and DWR accepted public comments on the project.

2.1 Notice of Preparation

DWR initiated scoping for the project on January 15, 2020 by filing an NOP (Appendix A) with the California Office of Planning and Research via the State Clearinghouse. As described in Chapter 1, an NOP informs reviewers of the lead agency's intent to prepare an EIR per CEQA Guidelines Section 15082 and solicits their participation in determining the scope of the EIR.

2.2 Public Noticing

Project public noticing efforts and activities are listed and further described below.

- Distributing copies of the NOP to county clerks for posting
- Preparing and distributing notices in seven newspapers
- Distributing the NOP to numerous libraries throughout the state
- Mailing letters to federal, state and local agencies
- Mailing a postcard to the project mailing list
- Making fliers available at locations in and around the project area
- Maintaining a project website for stakeholders to review information
- Sending email notifications to the project email list
- Conducting outreach to Environmental Justice and Disadvantaged Communities
- Providing a project-related email addresses to submit questions (i.e., deltaconveyance@water.ca.gov)
- Providing a project-related email address and toll-free phone number to submit comments (i.e., DeltaConveyanceScoping@water.ca.gov)
- Holding a series of public scoping meetings

Copies of public noticing documents are in Appendix B; copies of scoping meeting materials are in Appendix C.

2.2.1 County Clerks Notices

DWR distributed copies of the NOP to 34 county clerk offices in the project area and throughout the state. DWR asked counties to make the NOP available for public review during the scoping period. DWR provided county clerks with a copy of the NOP, a transmittal form, and a flier that contained information about the scoping period. DWR also provided counties with a self-addressed stamped envelope for returning a receipt of document arrival to DWR.

2.2.2 Newspaper Notices

DWR placed notices in seven newspapers of general circulation throughout the state to notify the public about the start of project scoping. The newspaper notices included information about publication of the NOP, the scoping period's comment deadline, and ways to comment via email and regular mail. The newspaper notices included a link to the project website where the public could obtain a copy of the NOP, along with additional materials and information about the public scoping meetings. The newspaper notices also included a telephone number and an email address for those seeking additional information or to requests hard copy materials.

2.2.3 Library Notices

DWR distributed the NOP and a project flier to 131 libraries around the state, requesting they post the two documents in a location designated for public notices so the general public could be made aware of the public review period.

2.2.4 Letters

DWR sent federal agencies, responsible and trustee agencies, and community groups from the project mailing list, a letter formally notifying them of NOP publication and the opportunity to provide scoping comments. The letter was sent to 45 state and federal agencies, and 155 disadvantaged community representatives. The letter described the project, gave the deadline for providing comments on the NOP, described the ways in which comments could be provided via email or regular mail, and gave the dates and locations of public meetings. A full copy of the NOP was enclosed with each letter.

Project notification letters were also sent to tribes inviting them to consult on the project and providing them with a copy of the NOP for information regarding the scoping process. These notification letters were sent to a total of 121 tribes using contact information provided by the Native American Heritage Commission for counties within the project area. The consultation process is different than the public scoping process and tribes can choose to provide comments publicly (through the scoping process) or through consultation with DWR.

2.2.5 Postcard

DWR mailed a postcard notice to more than 14,000 state agencies, landowners, state water contractors, public water agencies, and persons who had expressed interest in the project, or had previously expressed interest in California WaterFix. The postcard notice included information about publication of the NOP and a link to the project website for viewing the full NOP. The postcard

also gave the comment period deadline, information about how to provide comments via email or regular mail, and gave the dates and locations of the public scoping meetings.

2.2.6 Fliers

DWR distributed fliers to multiple locations in and around the project area to notify the public and stakeholders about the scoping process and the opportunity to provide comments. The flier announced publication of the NOP, gave the comment period deadline and information about ways to provide comments. The flier included the dates and time of the public scoping meetings and included a link to the project website where interested persons could find additional information and a full copy of the NOP.

2.2.7 Project Website

DWR posted information about scoping on the project website at https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning. The website provided information regarding publication of the NOP, the ways in which comments could be provided, the comment deadlines and the dates and locations of the scoping meetings.

The website also includes the following information about the project.

- DWR press release announcing the publication of the NOP
- A complete copy of the NOP
- A map of the proposed Project Facility Corridor Options
- A list of commonly asked questions and answers (in English and Spanish)
- Delta Conveyance Environmental Review Notice of Preparation Overview Fact Sheet (in English and Spanish)
- A list of locations where hard copy documents was available
- A schedule of the scoping meetings
- Information presented at the scoping meetings
- Scoping meeting agendas
- Scoping meeting presentation
- Reference materials

2.2.8 Email Notices

DWR sent email notices to more than 7,320 members of the project email list, which included those who had previously expressed interest in California WaterFix. The email notice included information about publication of the NOP, gave the comment period deadline and described ways to provide comments. The email notice also included the dates and time of scoping meetings and a link to the project website where interested persons could find additional information about the project and a full copy of the NOP. Additional emails were distributed in late January to remind interested parties about the scoping meetings. An email notice was sent in February to inform people that an additional meeting was scheduled in Redding on March 2, 2020. In March, an email was distributed

to provide notice of the comment period extension. An additional email was distributed in April as a reminder of the comment period deadline.

2.2.9 Outreach to Environmental Justice and Disadvantaged Communities

To best serve the environmental review process, DWR developed and executed a robust outreach program to ensure participation of disadvantaged communities and environmental justice organizations in the scoping process. Specific outreach activities included the following.

- Distributing three email notices about scoping participation and comment opportunities to over 500 Delta and Southern California environmental justice organizational contacts in February and March.
- Contacting over 15 Southern California organizations to remind them about the Los Angeles scoping meeting.
- Providing information to Contra Costa Supervisor Diane Burgis to alert her constituents/followers about the opportunity to submit comments.
- Attending the public scoping meetings and having an Environmental Justice table to provide guidance about the function of the scoping phase, assist participants in submitting comments, and engage them in future participation opportunities.
- Facilitating a comment workshop with Stockton-based Little Manila Rising's Environmental Justice Youth Advocates. They submitted a sign-on scoping letter based on the meeting proceedings.
- Facilitating a comment workshop with the GreenLA Water Committee that included representatives from Heal the Bay, Sierra Club of Los Angeles and Orange County, Deirdre Des Jardins from California Water Research, Environmental Water Caucus, Southern California Watershed Alliance, LA River Project, NRDC, LA WaterKeeper, and the South Bay Chapter of Surfrider.
- Emailing over 500 Delta and Southern California environmental justice organization contacts, calling 25 environmental justice or Delta-based community organizations and speaking with contacts at 14 organizations to solicit interest in having facilitated comment submission workshops and to identify participants.
- Conducting briefings with community leaders and representatives of environmental justice and Delta-based organizations, such as Restore the Delta, East Bay Regional Parks District, Fathers and Families of San Joaquin, The Freshwater Trust, Community Water Center, and others to inform them about the project.

2.3 Scoping Meetings

DWR held seven initial scoping meetings, which were held in February 2020 (Table 1). The Sacramento meeting location was selected to be accessible to state agency and non-governmental organization staff who wished to participate in the scoping process. The Walnut Grove, Clarksburg, and Brentwood meeting locations were selected to provide multiple opportunities for those living and working in close proximity to the project an opportunity to comment. The Los Angeles and San

Jose meeting locations were selected to provide an opportunity for state water contractors, public water agencies, their customers, and interested members of the public in the SWP service area an opportunity provide comments. In response to multiple requests, DWR held an additional scoping meeting in Redding, California to provide an opportunity for stakeholders and tribes in the northern portion of the Sacramento Valley to comment directly to the project team leading development of the EIR. More than 150 people attended that meeting. By the end of the scoping period, DWR held eight scoping meetings and hosted more than 700 total attendees.

Table 1. Project Public Scoping Meeting Locations and Attendance

Meeting Location	Date	Attendees
California Environmental Protection Agency Building 1001 I Street, Sacramento	Monday, February 3, 2020 1 p.m. – 3 p.m.	106
Junipero Serra State Building 320 West Fourth Street, Los Angeles	Wednesday, February 5, 2020 6 p.m. – 8 p.m.	43
Jean Harvie Community Center 14273 River Road, Walnut Grove	Monday, February 10, 2020 6 p.m. – 8 p.m.	124
Santa Clara Valley Water District Board Room 5750 Almaden Expressway, San Jose	Wednesday, February 12, 2020 6 p.m. – 8 p.m.	25
San Joaquin Council of Governments Board Room 555 Weber Avenue, Stockton	Thursday, February 13, 2020 6 p.m. – 8 p.m.	65
Clarksburg Middle School Auditorium 52870 Netherlands Road, Clarksburg	Wednesday, February 19, 2020 6 p.m. – 8 p.m.	104
Brentwood Community Center Conference Room 35 Oak Street, Brentwood	Thursday, February 20, 2020 6 p.m. – 8 p.m.	110
Sheraton Redding Hotel 820 Sundial Bridge Drive, Redding	Monday, March 2, 2020 6 p.m. – 8 p.m.	157

DWR designed the scoping meeting format to allow as much time as possible to hear public comments. There was a brief presentation about the project and the purpose of scoping, which was followed by a brief question and answer period. The question and answer period focused on providing clarification about the scoping process and the EIR process overall.

For all meetings, the presentation and question and answer portion accounted for roughly 10–15 minutes of the meeting. Those who wished to make oral comments were asked to fill out a speaker card. Speakers were called to speak in the order the cards were received. DWR made every effort to accommodate everyone who wanted to speak at the scoping meetings and reminded speakers they could submit written comments if they had additional comments they wished to make. Additionally, meeting attendees who wanted to submit comments could fill out a comment card and turn it in before leaving the meeting or mail it to DWR before the close of the scoping period.

DWR provided a Spanish language interpreter at all of the scoping meetings to provide interpretive services if needed. The interpreter introduced themselves at the start of each meeting and made meeting attendees aware that Spanish language interpretation was available.

2.4 Scoping Comment Submission

DWR provided multiple ways for the public, stakeholders, and agencies to provide comments during the scoping period. At the scoping meetings held in February and March 2020, attendees could submit oral comments to DWR and representatives of the project team; these comments were recorded by a court reporter. Attendees could also leave handwritten comments on a comment card. Comment cards could also be taken from the meeting and mailed to DWR before the close of the comment period. Attendees who wanted to submit comments via email were directed to the project's scoping comment email address (i.e., DeltaConveyanceScoping@water.ca.gov). Those who preferred to mail a letter could send it directly to the attention of Renee Rodriguez at DWR (PO Box 942836, Sacramento, CA 94236). Some commenters also submitted oral comments through the toll-free telephone hotline.

2.5 Comments Received After the Close of Scoping

Some commenters submitted letters after the close of the scoping period on April 17, 2020 at 5:00 p.m. All comments received after the close of the scoping period were reviewed by DWR and will be considered in the development of the EIR; however, comments received after the close of the comment period at 5:00 p.m. on April 17, 2020 are not summarized or otherwise included in this report.

Chapter 3
Scoping Comments Summary

3.1 Overview of Commenters

DWR received comments in the form of letters, emails, comment cards, and verbal comments that were transcribed by a court reporter during the eight public scoping meetings and via a toll-free phone line. In all, over 2,000 individuals, organizations and agencies submitted comments to DWR.

Commenters are listed below by category (i.e., federal agencies, tribes, state and local agencies, elected officials, special districts and water companies, and interest groups, organizations and businesses).

Federal Agencies

- Bureau of Reclamation
- Western Area Power Administration

Tribes

- Buena Vista Rancheria of Me-Wuk Indians
- Hoopa Valley Tribe
- Nor Rel Muk Wintu Nation
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Shingle Springs Band of Miwok Indians
- Viejas Band of Kumeyaay Indians
- Winnemem Wintu Tribe

State Agencies

- California Department of Fish and Wildlife
- California Department of Parks and Recreation
- California Department of Transportation
- California Department of Toxic Substances Control
- Central Valley Flood Protection Board
- Delta Protection Commission
- Delta Independent Science Board
- Delta Stewardship Council
- San Francisco Bay Conservation and Development Commission
- State Lands Commission
- State Water Resources Control Board

Local Agencies

- Butte County
- City of Folsom
- City of Roseville
- City of Sacramento
- City of Shasta Lake
- City of Stockton
- Contra Costa County
- River Delta Unified School District
- Sacramento County
- Sacramento Metropolitan Air Quality Management District
- San Joaquin County
- San Joaquin Valley Air Pollution Control District
- Solano County
- Yolo County

Elected Officials

- Congressman John Garamendi
- Stockton City Councilmember Sol Jobrack
- Supervisor Diane Burgis, Contra Costa County Board of Supervisors
- Supervisor Jim Provenza, Yolo County – Delta Counties Coalition
- Supervisor Patrick Kennedy, Sacramento County – Delta Counties Coalition
- Supervisor Skip Thomson, Solano County – Delta Counties Coalition
- Supervisor Chuck Winn, San Joaquin County – Delta Counties Coalition
- Supervisor Karen Mitchoff, Contra Costa County – Delta Counties Coalition
- Supervisor Steve Lambert, Butte County
- Mayor Janice Powell, City of Shasta Lake
- Mayor Kevin Romick, City of Oakley

Special Districts and Water Companies

- Alameda County Water District
- Brannan-Andrus Levee Maintenance District
- Carmichael Water District
- Calleguas Municipal Water District
- Clarksburg Fire Protection District
- Contra Costa County Flood Control and Water Conservation District
- Contra Costa Water District
- Central Delta Water Agency
- Cucamonga Valley Water District
- Diablo Water District

East Bay Municipal Utility District
East Bay Regional Park District
Eastern Municipal Water District
El Dorado Irrigation District
Foothill Municipal Water District
Inland Empire Utilities Agency
Irvine Ranch Water District
Las Virgenes Water District
Local Agencies of the North Delta
Los Angeles Department of Water and Power
Metropolitan Water District of Southern California
Moulten Niguel Water District
Municipal Water District of Orange County
North Delta Water Agency
Placer County Water Agency
Rancho California Water District
Reclamation Districts 3, 150, 551 and 999
Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113, 2117
Reclamation District 1002
Reclamation District 2060
Reclamation District 2067
Regional Water Authority
Sacramento County Water Agency
Sacramento Municipal Utility District
Sacramento Regional County Sanitation District
Sacramento River Settlement Contractors
Sacramento Suburban Water District
San Gabriel Valley Municipal Water District
San Juan Water District
San Luis- Delta Mendota Water Authority
Santa Clara Valley Water District
South Delta Water Agency
Tehama Colusa Canal Authority
Upper San Gabriel Valley Municipal Water District
Westlands Water District
Zone 7 Water Agency

Non-Governmental Organizations

Alliance for Resilient Communities
American Council of Engineering Companies
American River Water Agencies
AquAlliance
Association of California Cities–Orange County
Associated General Contractors of California
Audubon California
Bear Creek Watershed Group
Beverly Hills Hollywood NAACP
Big Break Visitors Center
BizFed
Building Industry Association of Southern California
California Alliance for Jobs
California Building Industry Association
California Business Properties Association
California Central Valley Flood Control Association
California Chamber of Commerce
California Delta Chambers and Visitor's Bureau
California Farm Bureau Federation
California Indian Environmental Alliance
California Indian Water Commission
California Small Business Association
California Sport Fishing Protection Alliance
California State Conference of the NAACP
California State Laborers Council
California Striped Bass Association
California Small Business Association
California Teamsters Public Affairs Council
California Asian Chamber of Commerce
California-Nevada Conference Operating Engineers
California Water Research
California Water Impact Network
Californians for Water Security
Camarillo Chamber of Commerce
Center for Biological Diversity
Central City Association
Central City Association Los Angeles
Chino Valley Chamber of Commerce
Clarksburg Community
Contra Costa County Farm Bureau
Construction Industry Coalition on Water Quality
Defenders of Wildlife
Delta Counties Coalition
Delta Defenders
Desert Valley Builders Association
El Monte/South El Monte Chamber of Commerce
El Segundo Chamber of Commerce
Engineering Contractors Association
Environmental Water Caucus
Environmental Council of Sacramento
Fathers and Families of San Joaquin
Fly Fishers International–Northern California
Friends of the 1883 Clarksburg School House
Friends of Clarksburg Services and Recreation
Friends of the Calaveras River
Friends of Stone Lakes Wildlife Refuge
Glendale Chamber of Commerce
Golden Gate Salmon Association
Greater Coachella Valley Chamber of Commerce
Greater Ontario Business Council
Greater Riverside Chambers of Commerce

Greenaction for Health and Environmental Justice
Harbor Association of Industry and Commerce
Hesperia Chamber of Commerce
HUHS Water Protectors Club
Hood Community Council
IBEW Local 6
IBEW Local 47
IBEW Local 428
Inland Action
Inland Empire Economic Partnership
International Operating Engineers Local 3
Institute for Fisheries Resources
Kern, Inyo and Mono Counties Building Trades Council
Los Angeles/Orange County Building and Construction Trades Council
Laborers' International Union of North America
LAX Coastal Chamber of Commerce
League of Women Voters of California – San Joaquin County
LGBT+Social Justice Initiative
Little Manila Foundation
Little Manila Rising
Long Beach Area Chamber of Commerce
Los Angeles Business Council
Los Angeles Chamber of Commerce
Los Angeles County Business Federation
Mid Klamath Watershed Council
National Audubon Society, San Joaquin Chapter
Natural Resources Defense Council
North Coast Rivers Alliance
North Delta CARES
North Orange County Chamber
North State Water Alliance
Northern California Carpenters Regional Council
Northern California Water Association
Operating Engineers Local 3
Orange County Business Council
Oxnard Chamber of Commerce
Pacific Coast Federation of Fisherman's Association
Palos Verdes Peninsula Chamber of Commerce
Planning and Conservation League
Rancho Cucamonga Chamber of Commerce
Recreational Boaters of California
Redondo Beach Chamber of Commerce
Restore the Delta
Rogue Climate
Sacramento County Farm Bureau
Sacramento Metro Chamber
Sacramento River Council
San Francisco Bay Keeper
San Francisco Bay Conservation and Development Commission
San Francisco Crab Boat Owners Association
San Gabriel Valley Economic Partnership
San Gabriel Valley Regional Chamber of Commerce
San Joaquin Audubon Society
San Joaquin County Climate Action Coalition
San Joaquin County Farm Bureau
San Joaquin Historical Museum
San Joaquin Pride Center
San Jose–Silicon Valley NAACP
Santa Clara and San Benito Counties Building and Construction Trade
Santa Clarita Valley Chamber of Commerce
Save California Salmon
Save the California Delta Alliance
Shasta Environmental Alliance
Sierra Club of California
Silicon Valley Leadership Group
Silicon Valley NAACP
Silicon Valley MEPS
Solano County Farm Bureau
South Bay Association of Chambers of Commerce
Southern California Contractors Association
Southern California Partnership for Jobs
Southern California Water Coalition
State Building and Construction Trades Council of California
Sustainable Burbank Commission
Sustainable Stockton
The Bay Institute
The Silicon Valley Organization
Third City Coalition
Torrance Area Chamber of Commerce
Transmission Agency of Northern California
Tuolumne River Conservancy
UA Plumbers and Pipefitters Local Union 114
UNITE HERE Local 30
United Contractors
Valley Industry and Commerce Association
Valley Land Alliance
Ventura County Coalition of Labor, Ag and Business
Ventura County Economic Development Association
Ventura County Taxpayers Association
Victor Valley Chamber of Commerce
Water4Fish
We Advocate Through Environmental Review
Westside Council Chambers of Commerce
With Our Words, Inc.
Wintu Audubon Society

Yolo County Farm Bureau

Businesses

Biofuelwatch
Clifton Court, L.P.
Double M Farms
Geothermal Worldwide, Inc.
John McCormack Co.
Snug Harbor Resorts, LLC
SolAgra Corporation
Steamboat Acres
Steamboat Resort
Substratum Systems
Terra Land Group
Wilbur-Ellis Company
Wilson Farm & Vineyards

Individuals

Approximately 550 individuals submitted written comments in the form of emails, comment cards, or letters, or provided verbal comments at public scoping meetings. Over 1,200 individuals submitted form letters or signed petitions.

3.2 Summary of Comments Received

The following sections summarize comments received; comments are presented by EIR resource section and topic.

DWR reviewed all comments received during the scoping period (i.e., January 15 through April 17, 2020) in detail to inform themselves and the project team about issues of concern related to the project, both in general and about specific items for consideration regarding the environmental review's scope. Comments relevant to the EIR will be considered during development of the document.

Appendix D contains a more detailed comment summary arranged by commenter and by category of resource sections that will be analyzed in the EIR. Not all comments in Appendix D are presented verbatim; they are summarized or rephrased as appropriate. Comments are categorized by resource topic to help DWR and the project team review comments relevant to specific topics or resource areas. All comment letters received during the scoping period are in Appendix E. Supplemental material attached to comment letters is not included in Appendix E but is available upon request.

3.2.1 Project Purpose and Objectives

Multiple commenters disagree that there is or should be a need to provide reliable SWP water supplies to the Central Valley and southern California. Some comments suggested that water should not be used for agriculture in an area that cannot provide its own sustainable local water sources. Other commenters stated that purpose and objectives of the project are erroneous because southern California could invest in developing local supplies or because there is already sufficient local water supplies to meet demand. Some commenters expressed concerns that the project purpose and objectives were written such that some alternatives would be excluded without sufficient consideration, and that the need was too narrowly focused on benefits to SWP users.

Multiple commenters agreed with the project purpose and objectives and stated that reliable fresh water from the SWP was critical to meeting demands and was necessary to make local water supply reliability projects continue to be effective.

Some commenters requested that the project purpose and objectives include ecosystem restoration and flood safety. Other commenters requested that the project objectives explicitly state a preference for using publicly owned land where possible. Comments also raised concerns about whether water transfers from willing sellers would be considered an objective of the project.

3.2.2 Description of Proposed Project Facilities

Multiple commenters requested a more detailed description of proposed project facilities. Comments suggested that the project description in the NOP was not sufficiently detailed. Commenters requested that the project description should include as much detail about proposed facilities as possible, (e.g., it should describe all facilities, including sizes, capacities, features, routing, etc.). Commenters also sought clarity regarding the inclusion of the islands owned by Metropolitan Water District of Southern California as part of the project.

Several commenters stated that the project description should include proposed operations. Specifically, commenters requested a detailed description of baseline operations compared to proposed operations and modeled operations. Commenters also requested that the project description include a description of how adaptive management might define future operations. Commenters also suggested the project description should include a role for Delta stakeholders in the adaptive management framework proposed as part of the project.

3.2.3 Alternatives

Commenters suggested a wide range of alternatives to be considered in the EIR. Some commenters made general requests for DWR to study alternatives that would reduce potential impacts to privately owned land, agricultural land, and communities. Some commenters expressed opposition to the central corridor, and others expressed opposition to the eastern corridor option. Some commenters expressed a preference for a 6,000-cfs facility. Suggestions for alternatives included are listed below.

- Consider a no tunnel alternative that focuses on the other elements of the California Water Resilience Portfolio such as water use efficiency, conservation, increased rainwater/stormwater capture and recycling, groundwater banking, and the following items.
    - Expanded use of gray water for urban landscaping
    - Incremental demand reduction measures such as water efficient agricultural policies
    - Mandatory conservation for urban users that would be less environmentally harmful and achieve acceptable water supply reliability goals and targets
    - Greater investment in desalination to meet Southern California water demands
- Consider brackish desalination that would treat brackish water from the Delta and then convey it south using the existing SWP.
- Consider covering the California Aqueduct to improve efficiency.
- Consider the West Delta Intakes Concept, which would relocate the principal point of diversion for exports from the South Delta to the West Delta. Surplus water during high flow events would be extracted through permeable embankments on Sherman Island that would be converted into a reservoir for capturing fresh water during high flows.
- Consider the alternative proposal submitted by Congressman Garamendi, which would make use of the Sacramento Deep Water Ship Channel and include a new 3,000-cfs capacity diversion in the western Delta to minimize impacts on productive agricultural land, reduce flood risk, and reduce impacts on the environment.
- Consider an alternative that seeks to address seismic and climate risks for SWP customer service areas.
- Consider an alternative that seeks to improve levees and reduce flood risk in the Delta.
- Consider an operational alternative that increases Delta outflow and reduces exports as compared to current conditions in the Delta.
- Consider an alternative that would include strengthening levees and reducing exports and provide more water through-Delta seaward to mitigate salt-water intrusion.

- Include a twin tunnel alternative such as California WaterFix as a point of comparison.
- Consider an alternative that includes construction of a dam in the Carquinez Strait or at the Golden Gate Bridge to prevent saltwater intrusion due to sea level rise.

3.2.4 Relationship to Other Processes, Plans, Programs or Policies

Multiple commenters raised concerns regarding the project's relationship with the 2009 Delta Reform Act and the act's requirements for consistency with the *Delta Plan* (Delta Stewardship Council 2019). Commenters also raised concerns regarding the project's ability to acquire the necessary approvals from the State Water Resources Control Board for a change in point of diversion. Other commenters raised concerns regarding potential changes to outflow requirements that are anticipated as a result of the State Water Resources Control Board's update to the *Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary* (Bay-Delta Plan) (State Water Resources Control Board 2018). Many commenters requested clarification regarding the relationship between the project and the Water Resilience Portfolio. Some commenters raised concerns regarding coordinated long-term operations with the CVP considering current litigation between the State of California and the federal government. Commenters also requested clarification about the relationship between the project and the 2019 *Biological Opinion for the Reinitiation of Consultation on the Coordinated Operations of the Central Valley Water Project and the State Water Project* (National Marine Fisheries Service 2019 and U.S. Fish and Wildlife Service 2019).

3.2.5 Water Supply and Surface Water Resources

Multiple commenters raised concerns regarding surface water supplies. Many commenters requested an analysis of water supply impacts to the Trinity and Klamath areas in the EIR. Many commenters requested a thorough evaluation of water supply impacts to Delta residents.

Multiple commenters raised concerns regarding surface water resources. Commenters requested studies of surface water resource impacts to the Trinity and Klamath river watersheds. Commenters requested analysis of potential effects from sea level rise in the Delta and subsequent flooding. Other commenters requested DWR address potential degradation of adjacent levees. Commenters also requested analysis of potential impacts to local or adjacent facilities in the EIR. Commenters suggested that analysis in the EIR focus on levee improvement and flood management.

3.2.6 Groundwater

Some Delta residents raised specific concerns regarding possible effects on groundwater supplies during dewatering of certain areas during construction of the proposed facilities. They also expressed concern about project impacts to residential wells and agricultural wells.

3.2.7 Water Quality

Multiple commenters raised concerns regarding the degradation of water quality in the Delta, and specifically the south Delta. Many commenters stated that water quality is already poor and suggested that the project would only exacerbate existing water quality challenges. Commenters

requested that DWR analyze the potential impacts of harmful algae blooms. Commenters also expressed concern over salinity in the Delta and impacts from reverse flows.

3.2.8 Geology and Seismicity

Commenters requested that DWR study the ability of tunnels to survive major earthquakes. Commenters questioned whether seismic risks were present in the project area. Some commenters requested that DWR consider how construction of the project could affect the long-term stability of other structures in the Delta with deep foundations through soil settlement, subsidence, undermining, lateral earth movement, and vibration-induced settlement. Commenters requested completing geotechnical investigations to assess ground conditions, especially where there might be right-of-way crossings with other structures. Commenters also provided mitigation and monitoring suggestions for reducing or avoiding potential impacts to ground stability.

3.2.9 Soils

Commenters raised concerns that construction activities from the project could affect soil engineering properties, drainage, and surface and subsurface hydrology, which could increase soil liquefaction. Other commenters questioned the removal of soil to construct new forebays and where the soil would be taken.

3.2.10 Fish and Aquatic Resources

Many commenters expressed concern over potential impacts to fish and aquatic resources. Commenters discussed concerns over impacts to Chinook salmon (*Oncorhynchus tshawytscha*) and other fish species in the Klamath and Trinity River watersheds that they believe could be affected by the project. Other commenters expressed similar concerns about fish in the Sacramento, American and San Joaquin River watersheds. Commenters suggested that DWR should analyze entrainment and impingement risks that new intake facilities in the north Delta might have on fish species, and that DWR should define operating criteria and mitigation measures to avoid or reduce impacts to fish and aquatic resources.

3.2.11 Biological and Terrestrial Resources

Multiple commenters expressed concern that the project would have significant impacts on biological resources in the project area. Commenters requested analysis of impacts to wildlife and their habitat, including upland habitat, for publication in the EIR. Commenters also suggested analysis of impacts on wetlands.

3.2.12 Land Use

Delta residents commented that the EIR should analyze impacts on zoning and land uses authorized by law on residential parcels, and that the EIR should both describe land use conflicts and mitigate for those conflicts. Comments were made that the proposed reusable tunnel material is inconsistent with existing zoning designations and that the EIR should acknowledge those conflicts.

3.2.13 Agricultural Resources

Many commenters expressed concern about the impact the project would have on agricultural resources and the livelihood of farmers in the Delta. Commenters raised issues with farmland potentially being taken out of production and soil potentially being affected by saltwater intrusion in the Delta. Many Delta residents and other commenters stated the project could have significant impacts on agricultural resource production.

3.2.14 Recreation

Numerous commenters voiced concerns that the project could have significant impacts on movement through navigable waterways. Boating interests expressed opposition to project construction. Other recreationists stated the project would result in indirect impacts to marinas and small boating businesses.

3.2.15 Socioeconomics

Many Delta residents suggested the EIR should consider socioeconomic impacts to Delta residents and communities, including impacts to businesses, sense of place, and livelihoods as a result of project construction and operation. Other commenters suggested that recreation impacts resulting from the project would cause indirect socioeconomic impacts, such as reduced business at local marinas. Commenters requested analysis to be performed on the potential impacts the project could have related to loss of local revenue for business and agricultural production, and for mitigation or environmental commitments to be included to offset those losses. Additionally, commenters raised concerns regarding the loss of property values for residents in primary and secondary zones of the Delta.

3.2.16 Aesthetics and Visual Resources

Commenters requested that the EIR disclose any potential visual disturbances to residents near the intake locations and other facilities such as the forebay. Commenters also raised concerns about potential visual disturbances recreationists might experience when using the river or riverbank.

3.2.17 Cultural Resources

Commenters raised concerns about impacts to historic structures in the area, especially those that are visitor attractions. Other commenters emphasized the importance of designing a project that preserves and avoids impacts to cultural resources in the Delta, which include the historic communities of Hood, Locke, Clarksburg and Walnut Grove. Commenters also raised concerns about the potential impacts of construction and ground-disturbing activities on archaeological sites and asked that construction monitors be provided during construction to ensure cultural resources are protected.

3.2.18 Transportation

Commenters requested an analysis of traffic impacts along routes in the Delta during project construction. Local residents expressed concern that project construction could have impacts to emergency vehicle access and school routes, and that mitigation should be considered for those

impacts. Other commenters expressed concern that construction traffic could degrade existing levees; they sought commitments that improvements and repairs would be made to levees that experienced construction traffic impacts.

3.2.19 Public Services and Utilities

Commenters raised concerns regarding emergency access both for construction crews, residents, and business in the project area. Commenters stated that there are few fire stations and emergency medical providers in the area that would be available to respond to potentially increased demand during project construction. Commenters also raised general concerns that the project could have impacts to public utilities such as gas, power and water service for residents and business in the project vicinity.

3.2.20 Energy

Commenters raised concern about project construction in and around existing power supply infrastructure and the potential effects it might have to the overall state energy grid. Other commenters raised general concerns regarding the overall energy footprint of the project.

3.2.21 Air Quality and Greenhouse Gas Emissions

Commenters requested analysis of air pollution and greenhouse gas emissions. Specific comments focused on the study of air quality impacts from construction on rural communities and urban southwest Stockton. Other commenters called for an evaluation of carbon emissions during project construction and operation.

3.2.22 Noise

Commenters requested an analysis of impacts related to noise generated from pile driving for the EIR. Commenters also raised concerns about the potential impacts that noise associated with the construction of the project could have on businesses, schools, and residents in the project area.

3.2.23 Hazards

Commenters requested that the EIR evaluate the potential for construction activities to release hazardous materials both from ground disturbance and from structure demolition. Commenters also raised concerns regarding the potential for construction activities to intersect with existing oil and gas lines in the area and release hazardous materials. Other commenters stated that the tunnel material should be evaluated as a potentially hazardous material. Some commenters raised concerns regarding existing hazards in the project area associated with historic agricultural practices, requested an evaluation of those potential effects, and if needed, appropriate abatement measures.

3.2.24 Public Health

Commenters asked DWR to examine air pollution impacts as they relate to public health. Commenters also raised concerns regarding harmful algal blooms and mobilization of airborne cyanobacteria as a result of the project. Commenters also raised concerns about drinking water

quality for those who rely on Delta surface and groundwater supplies. Commenters also stated interest in potential impacts associated with mosquitos and mosquito-borne diseases.

3.2.25 Minerals

Commenters requested that the EIR address existing laws and regulations related to mining and mineral extraction.

3.2.26 Paleontological Resources

No comments regarding paleontological resources were identified.

3.2.27 Environmental Justice

Some commenters raised concerns that environmental justice was missing as a resource category in the NOP, that this resource category should be added, and that analysis on impacts to environmental justice communities should be conducted. Stakeholders in environmental justice communities, such as the south Stockton area, asked DWR to continue outreach and dialog throughout the project's development. Commenters asked for expanded outreach to environmental justice communities across the state of California and in the project area, including portions of eastern Contra Costa County, San Joaquin County, and in southern Sacramento communities. Other commenters stated that indigenous persons would face environmental justice impacts in the Trinity and Klamath River watersheds because of their connection to the water sources and fisheries in those rivers. Commenters suggested that harmful algal blooms could result because the project could carry airborne toxins that would have a disproportionate impact on environmental justice communities.

3.2.28 Climate Change

Multiple commenters requested a full evaluation of the possible effects the project might have on increased greenhouse gas emissions that could contribute to climate change. Commenters also asked for an evaluation of potential effects climate change might have on the existing and proposed conveyance facilities.

3.2.29 Growth Inducement

Commenters raised concerns that the project may cause growth in southern California, which would create more need for fresh water supply from the Delta. Other commenters raised concerns about growth inducement in the project area as a result of roadway improvements made to facilitate construction or to mitigate potential traffic impacts.

3.2.30 Tribal Cultural Resources

Commenters asked DWR to meet with tribes to discuss analysis for tribal cultural resources; these might include resources that hold cultural or spiritual importance for tribes. Commenters also requested proposing mitigation such as construction monitors to reduce or avoid potential impact to tribal cultural resources.

3.2.31 Public Involvement, Consultation, and Coordination

Commenters requested an extension of the scoping period from the original deadline of March 20, 2020. As the April 17, 2020 deadline approached, multiple commenters requested an extension of the comment period, citing the COVID-19 pandemic and unprecedented circumstances requiring Californians to shelter in place. Several commenters stated that they should be considered Responsible or Trustee Agencies under CEQA. Some commenters requested additional information regarding the participation of a federal agency as the NEPA lead. Commenters asked DWR to conduct the necessary coordination and consultation with regulatory agencies, and to examine all permits and approvals needed to construct the project.

Some commenters requested a 6-month public review period for the Draft EIR. Commenters also requested releasing information and technical reports to the public in advance of the Draft EIR. Many commenters requested regular progress updates, and to be added to the project email or mailing lists.

3.3 Consideration of Scoping Comments in the Draft EIR

All comments received on the scope of the EIR are reviewed by DWR. Comments are sorted and distributed to the appropriate subject-matter experts who are writing the environmental analysis for consideration in the development of the Draft EIR. Subject-matter experts review comments for issues related to the scope of the analysis and resources to be evaluated, for recommendations for methods and data to be used in the analysis, and for suggested mitigation measures. Comments are also reviewed by DWR for suggested alternatives and suggestions for modifying the proposed project to avoid or minimize impacts. Alternatives suggested during the scoping period will be considered in the process of developing a reasonable range of alternatives to study in the EIR.

Chapter 4
Works Cited

California Natural Resources Agency, California Environmental Protection Agency and California Department of Food and Agriculture. 2020. *2020 Water Resilience Portfolio.* https://waterresilience.ca.gov/wp-content/uploads/2020/01/California-Water-Resilience-Portfolio-2019-Final2.pdf.

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U.S. Fish and Wildlife Service. 2019. *Biological Opinion for the Reinitiation of Consultation on the Coordinated Operations of the Central Valley Water Project and the State Water Project*. https://www.fws.gov/sfbaydelta/cvp-swp/documents/10182019_ROC_BO_final.pdf

Index of Scoping Commenters

The following table lists the name and agency/organization/affiliation of those who submitted comments during the Delta Conveyance scoping period. The letter number in this table corresponds to the letter number assigned to the commenter letter in Appendix E. In Appendix E, letters are identified with DCS (Delta Conveyance Scoping) and a letter number in the upper right hand corner of the file.

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
1	Dee	Joyce	
2	Lola	Hunter	
3	Bruce	Channing	Association of California Cities, Orange County
3	Jean	Lowe	Association of California Cities, Orange County
4	Art	Herbert	
5	Shoshana	Bianchi-McElwee	
6	Brian	Murphy	
7	Michael	Greggans	
9	David	Pedersen, P.E.	Las Virgenes Municipal Water District
10	Jim	Blickenstaff	Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club
11	David	Gloski	
12	Diane	Kirkham	
13	Michael	Seaman	
14	Andrea	Buckley	Central Valley Flood Protection Board
15	Ray	Teran	Viejas Band of Kumeyaay Indians
17	Leland	Frayseth	
19	Monique	Sonoquie	
20	Bill	Emlen	Solano County, Department of Resource Management
21	Karen	Huss	Sacramento Metropolitan Air Quality Management District
22	Tamarin	Austin	
23	Ryan	Hernandez	Contra Costa County Water Agency and County of Contra Costa

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
24	William	Burke	County of Sacramento
25	Alexandra	McCleary	San Manuel Band of Mission Indians
28	Anthony	Duarte	San Gabriel Valley Regional Chamber of Commerce
29	Hope	Salzer	
30	J. Mark	Myles	County of San Joaquin
31	Brad	Rosenheim	Valley Industry and Commerce Association
31	Stuart	Waldman	Valley Industry and Commerce Association
32	Robin	Durston	
34	Susan	Armstrong	
35	Don	Cremin	
36	Woody	Nedom	
37	Esme	Shaller	
38	Sharon	Keeton	
39	Mike	Rossi	
40	Sherry	Wilcoxson	
41	Louise	Harm	
42	Peter	Marini	
43	Rachael	Hopper	
44	Pete	Hansen	
45	May	Lee	
46	Barbara	Cohen	
47	Mark	Bailey	
48	Libby	Lucas	
50	Michael	Tognolini	East Bay Municipal Utility District
52	Margo	Robbins	
53	Leland	Freyseth	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
54	Lisa	Van Valkenburgh	
55	Philip	Pogledich	County of Yolo
56	Carolyn	McCall	
57	Paul	Cook	Irvine Ranch Water District
58	Nina	Jazmadarian	Foothill Municipal Water District
59	Carl	Tilchen	
60	Michele	Kelly-Jones	
61	Janice	Gloe	
62	Pamela	Burns	
63	Deb	Donovan	
64	Eric	Kueneman	
65	David F.	Scatena	
66	Sherrill	Hedman	
67	Aaron	Lowe	
68	Cassandra	Lista	
75	Kevin	Heldt	
79	Will	Harling	Mid Klamath Watershed Council
80	Dante John	Nomellini Sr.	Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113, 2117
81	Jan	Warren	
82	Joanne	Vinton	
83	James	Marsh	Friends of the Calaveras River
85	Luis	Portillo	Inland Empire Economic Partnership
85	Zeb	Welborn	Chino Valley Chamber of Commerce
85	Patrick	Swarthout	Greater Coachella Valley Chamber of Commerce
85	Peggi	Hazlett	Greater Ontario Business Council

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
85	Shannon	Shannon	Hesperia Chamber of Commerce
85	Paul	Granillo	Inland Empire Economic Partnership
85	Robert	Hufnagel	Rancho Cucamonga Chamber of Commerce
85	Mark	Greffield	Victor Valley Chamber of Commerce
87	Jacklyn	Shaw	
88	David	Wittrock	
89	Gary	Brown	
90	Jeri	Opalk	
91	Sheila	Gorsuch	
92	Karen	Cohen	
93	Susan	Meserve	
94	Maren	Stanczak	
95	Curnie	Webster	
96	Ed and Jeanne	Griffiths	
97	Thomas	Love	Upper San Gabriel Valley Municipal Water District
98	Nikola	Lakic	Geothermal Worldwide, Inc.
99	Paul	Theiss	
101	Lesley	Stansfield	
102	Kevin	Heldt	
103	Harry	Mash	
104	Paul and Lynda	Roy	
105	Randa	Solick	
106	Victoria	Tatum Wilson	
107	Betsy	Wilde	
108	Noel	Eberhardt	
109	Mike	Speckman	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
110	Sue	Higgins	
111	Geoff	Coombes	
112	Ron	Van Horne	
114	John	Hayward	Nor Rel Muk Wintu Nation
115	Susan	Simpson	
116	Virginia	Phelps	
117	Robert	Pyke	
118	Denise	Louie	
119	Mary	Leslie	Los Angeles Business Council
120	Burt	Milburn	
121	Petition		Save California Salmon
123	Lauretta	Aldridge	
124	Carlin	Black	
126	Lisa	Hoivik	
127	Carlin	Black	
128	Nancy	Kuykendall	
129	Nancy	Lindholm	Oxnard Chamber of Commerce
129	Cindy	Roth	Greater Riverside Chambers of Commerce
129	Gary	Cushing	Camarillo Chamber of Commerce
129	Michael	Lopez	UA Plumbers and Pipefitters Local Union 114
129	William	Manis	San Gabriel Valley Economic Partnership
129	Donna	Duperron	Torrance Area Chamber of Commerce
129	Shane	Gusman	California Teamsters Public Affairs Council
129	Joe	McDermott	Las Virgenes Municipal Water District
129	John	Spaulding	Kern, Inyo & Mono Counties Building Trades Council
129	Peter	Tateishi	Sacramento Metro Chamber

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
129	David	Grau	Ventura County Taxpayers Association
129	Michele	Newell	Ventura County Economic Development Association
129	Gretchen	Gutierrez	Desert Valleys Builders Association.
129	Brigette	Browning	UNITE HERE Local 30
129	Matt	Mahood	The Silicon Valley Organization
129	Brian	Holt	IBEW Local 428
129	Tracy	Hernandez	Los Angeles County Business Federation
129	Nancy	Starczyk	Santa Clarita Valley Chamber of Commerce
129	Ron	Hasson	Beverly Hills Hollywood NAACP
129	Anthony	Duarte	San Gabriel Valley Regional Chamber of Commerce
129	John	Doherty	IBEW Local 6
129	Patrick	Lavin	IBEW Local 47
129	Pastor Jethroe	Moore, II	San Jose - Silicon Valley NAACP
129	Curtis	Kelly	Northern California Carpenters Regional Council
129	Louise	Lampara	Ventura County Coalition of Labor Agriculture & Business
129	Dan	Reding	Operating Engineers Local Union 3
129	Deborah	Barmack	Inland Action
129	Emily	Cohen	United Contractors
129	Allan	Zaremberg	California Chamber of Commerce
129	Robbie	Hunter	State Building & Construction Trades Council Calif
129	Alice	Huffman	California State Conference of the NAACP
129	Jose	Mejia	Laborers' International Union of North America
129	Dan	Dunmoyer	California Building Industry Association.
129	David	Bini	Santa Clara & San Benito Counties Building and Construction Trade
129	Brad	Diede	American Council of Engineering Companies of California
129	Ron	Miller	LA/OC Building and Construction Trades Council

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
129	Charles	Wilson	Southern California Water Coalition
129	Michael	Quigley	California Alliance for Jobs
129	Maria	Salinas	Los Angeles Area Chamber of Commerce
129	Mike	Mielke	Silicon Valley Leadership Group
129	Pat	Kushida	Californian Asian Chamber of Commerce
129	Tim	Cremins	California-Nevada Conference Operating Engineers
129	Betty Jo	Toccoli	California Small Business Association
129	Stuart	Waldman	Valley Industry & Commerce Association
129	John	Hakel	Southern California Partnership for Jobs
129	Rex	Hime	
129	Jessica	Lall	Central City Association Los Angeles
130	Barbara	Mauk	
131	Felice	Pace	
132	Joe	Smithonic	Contra Costa County Flood Control & Water Conservation District
135	Bayla	Greenspoon	
136	Mike	Ackley	
137	Ellen	Koivisto	
138	Jan	Vick	Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission
139	Elke	Rank	Zone 7 Water Agency
140	Daniel	Muelrath	Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)
141	Patricia	Cheney	
142	Barbara	Tortorici	
143	Paul	Anderson	
144	Martin	Harris	Terra Land Group, LLC
145	Meredith	Cooper	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
146	Rachel	Huang	
147	Petition		Save California Salmon
148	Eihway	Su	
150	Colin	Diaz	Westside Council of Chambers of Commerce
151	Felice	Pace	
152	Patrick	Nolan	
153	Charles	Wilson	Southern California Water Coalition
154	Jacklyn	Shaw	
155	Samuel	Butler	
156	Donna	Sharee	
157	Julie	Fouquet	
158	Don	Lipari	
159	Jay	Uhalt	
160	Diane	Kirkham	
161	Dr. Steven	White	
162	Gene	Beley	
163	Peter	Aughney	
164	Barbara	Epstein	
165	David	Mackler	
166	Brian	Kreb	
167	Tracey	Licerio	
168	Rachel	Rolnicki	Orange County Business Council
169	Dennis	Tapley	
170	Rick	Downey	
171	William	Roltsch	
172	Lee	Johnson	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
173	Patricia	Atkins	
174	Hildy	Meyers	
175	Ian	Kent	
176	Jacklyn	Shaw	
177	Sunny	Cosce	
178	Meaghan	Simpson	
179	Helen	Harberts	
180	Martin	Heatlie	
181	Liz	Elias	
182	John	Armstrong	
183	Mermery	Bates	
184	Gary Graham	Hughes	Biofuelwatch
185	Susan	Wallace	
186	Phyllis	Johnston	
187	Marci	Stanage	Southern California Partnership for Jobs
188	Rosalie	Preston	
189	Maximilienne	Ewalt	
190	Jonathan	Baker	
191	Jeffrey	Michael	University of the Pacific, Eberhardt School of Business
192	Christine	Huttinger	
193	Josephine	Sambado	
194	Lynn	Whelden	
195	David	Fries	Conservation Chair, San Joaquin Audubon Society
196	Jasmine	Leek	Third City Coalition
198	Laura	Schneider	
199	John Michael	McKown	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
200	Jim	Williamson	
201	Kristen	Oliner	Restore the Delta
202	Daniel	Hodge	Recreational Boaters of California
203	Patricia	Osborn	
204	Raven	Stevens	We Advocate through Environmental Review (WATER)
205	Frank	Toriello	We Advocate through Environmental Review (WATER)
206	Steve	Gordon	
207	A. Elaine	Kite	Bear Creek Watershed Group
208	Morgan	Lindsay	
209	Kylee	Sorrell	HUHS Water Protectors Club
210	Anna	Powell	
211	Lindsay	Wood	
212	Pat	Lind	
213	Dania	Colegrove	
214	Will	Harling	Mid Klamath Watershed Council
215	Nicholas	Wilde	
216	Jenny	Staats	
217	Alessandra	De La Torre	
218	Gino	O'Rourke	
220	Stacy	Sebring	
221	John	Armstrong	
222	Jessica	Lall	Central City Association Los Angeles
223	Maria	Salinas	Los Angeles Area Chamber of Commerce
224	Patricia	Everall	
225	Kim	Thai	East Bay Regional Park District
226	George	Zdasiuk	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
227	Franz	Steiner	
228	Allan	Chan	
229	Dr. Tom	Williams	
230	Michael	Brodsky	Save the California Delta Alliance
231	Osha	Meserve	Local Agencies of the North Delta
232	Dee Dee	Saavedra	
233	Michael	Hazelton	
234	Martin	Harris	Terra Land Group, LLC
235	Tim	Stroshane	Restore the Delta
235	Nicholas	Hatten	LGBT+Social Justice Initiative
235	Nathan	Werth	Substratum Systems
235	Sammy	Nunez	Fathers & Families of San Joaquin
235	Dillon	Delvo	Little Manila Rising
235	Tim	Stroshane	Restore The Delta
235	Jasmine	Leek	Third City Coalition
235	Tama	Brisbane	With Our Words, Inc.
235	Barbara	Barrigan-Parrilla	Restore The Delta
236	Kathleen	Stein	
237	Jacklyn	Shaw	
238	Randy	Gordon	Long Beach Area Chamber of Commerce
239	David & Allison	Boucher	Tuolumne River Conservancy Inc
240	Tim	Ellenberger	
241	Ann	Dorsey	
242	Jack	O'Loughlin	
243	Judee	Kendall	Glendale Chamber of Commerce
244	Gerald	Robbins	Western Area Power Administration., Sierra Nevada Region

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
245	Richard	Harasick	Los Angeles Department of Water & Power
246	James	Sadler	
247	Jeffrey	Kightlinger	Metropolitan Water District of Southern California
248	Dr Tom	Williams	
249	Bryan	Griess	Transmission Agency of Northern California
250	Eileen	Hupp	Palos Verdes Peninsula Chamber of Commerce
251	Loren	Rhodes	
252	Sherri	Venezia	
253	Roger	Zeedik	
254	John	Garamendi	U.S. House of Representatives
255	Sandy	Rhodes	
256	Heinrich	Albert	
257	John	Armstrong	Sierra Club of California
258	Barbara	Barrigan-Parrilla	Restore the Delta
259	Dan	Bacherr	
260	Todd	Bloomstine	Southern California Contractors Association
261	Regina	Chichizole	
262	Regina	Chichizole	Save California Salmon
263	Chief Caleen	Sisk	Winnemem Wintu Tribe
264	Matt	Conover	Delta Reclamation District 1002
265	Molly	Culton	Sierra Club of California
266	Michael	DiMartino	Alliance for Resilient Communities
267	Katie	Donahue-Duran	California State Council of Laborers
268	James	Dunlap	
269	Jeff	Durbin	
270	Kyle	Griffith	Californians for Water Security

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
271	Isaac	Kinney	
272	Arthur	Knudson	
273	Tess	Latter	
274	Mariah	Looney	Restore the Delta
275	Osha	Meserve	Local Agencies of the North Delta
276	Emily	Moloney	Buena Vista Rancheria of Miwok Indians
277	Cliff	Moriyama	California Building Industry Association
278	Danielle	Ray Frank	
279	Margaret	Robbins	
280	Bob	Saunders	
281	Monique	Sonoquie	
282	Tim	Stroshane	Restore The Delta
283	James	Thuerwachter	California Alliance for Jobs
285		ANON	
286	Roberto	Valdez	
287	Susan	Wallace	
288	Charlene	Woodcock	
289	Bob	Wright	Sierra Club of California
290	Ron	Hasson	Beverly Hills Hollywood NAACP
291	Dan	Drugan	Calleguas Municipal Water District
292	Bruce	Campbell	
293	Clara	Karger	Central City Association
294	Michael	Lewis	Construction Industry Coalition on Water Quality
295	Conner	Everts	Environmental Water Caucus
296	Ken	Coate	Inland Action
297	Luis	Portillo	Inland Empire Economic Partnership

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
298	Cathleen	Pieroni	Inland Empire Utilities Agency
299	Ron	Miller	LA/OC Building and Construction Trades Council
300	Kendal	Asuncion	Los Angeles Chamber of Commerce
301	Stephen	Arakawa	Metropolitan Water District of Southern California
302	Mario	Milch	
303	Robert	Hunter	Municipal Water District of Orange County
304	Ken	Raush	El Monte/South El Monte Chamber of Commerce
305	Derek	Ryder	
306	Henry	Rogers	South Bay Association of Chambers of Commerce
307	Brandon	Dawson	Sierra Club of California
308	Mark	Grey	Building Industry Association of Southern California
309	Marci	Stanage	Southern California Partnership for Jobs
310	Charles	Wilson	Southern California Water Coalition
311	Vicki	Kirschenbaum	Sustainable Burbank Commission
312	Sarah	Wiltfong	Los Angeles County Business Federation
313	Michael	Lynes	Audubon California
314	Julie	Bongers	
315	Arnaud	Marjollet	San Joaquin Valley Air Pollution Control District
316	Paul	Jones II	Eastern Municipal Water District
316	Ronald	Sullivan	Eastern Municipal Water District
317	Julie	Bongers	
318	Julie	Bongers	
319	Dr Tom	Williams	
320	Adrienne	Register	
321	Christina	Davis	LAX Coastal Chamber of Commerce
322	Gloria	Alonso	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
323	Jeff	Balmores	
324	Miniya Jo	Brisbane	
325	Bill	Wells	California Delta Chambers and Visitor's Bureau
326	Orion	Camero	
327	Jasmine	Delafrost	
328	Niria Alicia	Garcia	
329	Nicholas	Hatten	LGBT+Social Justice Initiative
330	Sharon	Jarvis	
331	Sol	Jobrack	Stockton City Council
332	Earl	Jones	
333	Roger	Kelly	
334	Clarence	Kooi	
335	Jane	Wagner-Tyack	League of Women Voters of San Joaquin County
336	Tafari	Lee	
337	Elaine	Baret	Little Manila Rising
338	James	McGraw	
339	Chris	Neudeck	Kjeldsen, Sinnock & Neudeck
340	Dante	Nomellini Jr	Central Delta Water Agency
341	Dante	Nomellini, Sr.	Central Delta Water Agency
342	Darius	Waiters	
343	Margo	Praus	Sierra Club of California
344	Julia	Rapoza	Sustainable Stockton
345	Barbara	Barrigan-Parrilla	Restore the Delta
346	Mariah	Looney	Restore the Delta
347	Jaelyn	Sanidad	
348	Jack	Saunders	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
349	David	Scatena	
350	Brandon	Dawson	Sierra Club of California
351	David	Fries	National Audubon Society, San Joaquin Chapter
352	Margie	Fries	San Joaquin County Climate Action Coalition and the Peace and Justice Network
353	Phillip	Merlo	San Joaquin Historical Museum
354	Martha	Valdez	
355	Tryg	Sletteland	Sacramento River Council
355	Jonas	Minton	Planning and Conservation League
355	Mark	Rockwell	Fly Fishers International, Northern California
356	John	Heffernan	South Bay Association of Chambers of Commerce
357	Dominik	Knoll	Redondo Beach Chamber of Commerce
358	Henry	Rogers	Harbor Association of Industry and Commerce
359	Daniel	Armstrong	
360	Josephine	Avila	
361	Brett	Baker	
362	Donald	Barnes	
363	Susan	Caston	
364	Barbara	Daly	
365	Brian	Dawson	Sierra Club of California
366	Max	DeWalt	
367	Mark	Goble	
368	Corie	Hamer	
369	Douglas	Hsia	
370	Jeffrey	Michael	University of the Pacific, Eberhardt School of Business
371	Mariah	Looney	Restore the Delta
372	Mary	Elizabeth	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
373	James	Motlow	
374	Tim	Neuharth	Steamboat Acres
375	Russell	Oans	
376	Emily	Pappalardo	
377	Robert	Pope	
378	Greg	Robinson	
379	Nikki	Seward	
380	David	Stirling	
381	Peter	Stone	
382	Russell	van Loben Sels	
384	Stuart	Walthall	
385	Kelly	Abreu	Sierra Club of California - Water Committee
386	Carlin	Black	
387	Daphne	Frost	
388	Brandon	Dawson	Sierra Club of California
389	John	Delgado	
390	Josue	Garcia	Silicon Valley MEPS
391	Meg	Giberson	
392	Katja	Irvin	
393	Christophe	LaBelle	Silicon Valley Leadership Group
394	Mariah	Looney	Restore the Delta
395	Michael	Frost	
396	Penelope	Frost	
397	Elke	Rank	Zone 7 Water Agency
398	Stephen	Rosenblum	
399	Paul	Sethy	Alameda County Water District

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
400	Chris	Smith	Associated General Contractors of California
401	Chris	Snyder	International Operating Engineers Local 3
402	Clint	Steele	Operating Engineers Local 3
403	James	Thuerwachter	California Alliance for Jobs
404	Dr. Steven	White	
405	Jacklyn	Shaw	
407	David	Ogilvie	
408	Allie	Rosenbluth	Rogue Climate
410	Roger	Thibault	
411	Anna	Swenson	
412	Peter	Anderson	
413	Amanda	Beck	Board of Friends of Clarksburg Services & Recreation
414	Edward	Cull	
415	Molly	Culton	Sierra Club of California
416	Tressa	Dahlberg	North Delta Cares
417	Barbara	Daly	
418	Sonia	Diermayer	
419	Michael	DiMartino	Alliance for Resilient Communities
420	Jeff	Durbin	
422	Marilyn	Gill	
423	Wendy	Heaton	
424	Clarence	Kooi	Sierra Club of California
425	Bill	Martin	
426	Mario	Moreno	Hood Community Council
427	Tim	Neuharth	Steamboat Acres
428	Patrick	Porgans	Porgans & Associates

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
429	Mark	Pruner	Clarksburg Fire Protection District
430	Robert	Pyke	
431	Robert	Swenson	
432	Bob	Saunders	
433	Michael	Seaman	
434	Tom	Slater	
435	Russell	van Loben Sels	
436	Thomas	Wallace	
437	Bill	Wells	California Delta Chambers & Visitor's Bureau
438	Dan	Whaley	
439	Mark	Wilson	Wilson Farms & Vineyards
441	Evan	Aanenson	
442	Regina	Anidrole	Save California Salmon
443	Willard	Carlson	
444	Leona	Charles	
445	Rosie	Clayburn	
446	Dania	Colegrove	
447	Corey	Collier	
448	Molly	Culton	Sierra Club of California
449	Robert Weese	Duhn	
450	Mahlija	Florendo	
451	Jeanne	France	
452	Jason	Franklin	
453	Morning Star	Gali	
454	Georgiana	Gensaw	
455	Louis	Gustefson	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
456	Will	Harling	Mid Klamath Watershed Council
457	Winter Hawk	Rouse	
458	Annelia	Hillman	
459	Jasper	Hostler	
460	Isaac	Kinney	
461	Misa	Joe	
462	Thomas	Joseph	
463	Kee-Poon	Kinney	
464	Kenwani	Krowitz	
465	David	Ledger	Shasta Environmental Alliance
466	Joanne	Lee	California Indian Environmental Alliance
467	Mariah	Looney	Restore the Delta
468	Ruthie	Maloney	
469	Chao-Nuucks	Manuel	
471	Jene	McCovey	
472	Lorenita	McKinnen	
473	Luda	Miller	
474	Laurence	Mitchell	
475	Susan	Murray	
476	Pectah Ike	Kinney	
477	Janice	Powell	Mayor, City of Shasta Lake
478	Jason	Reed	
479	Margo	Robbins	
480	Ken	Robison	Golden State Salmon Association
481	Rain	Scher	
482	Chief Caleen	Sisk	Winnemem Wintu Tribe

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
483	Kylee	Sorrell	HUHS Water Protectors Club
484	Raven	Stevens	We Advocate through Environmental Review (WATER)
485	Atta	Stevenson	California Indian Water Commission
486	Tom	Stokey	Save California Salmon
487	Malissa	Tayaba	
488	Frank	Toriello	We Advocate through Environmental Review (WATER)
489	Jack	Trout	
490	Clark	Tuthill	
491	Vernon	Wilson	
492	Jacklyn	Shaw	
494	Jim & Linda Hall		
495	Rob	Ferrera	SMUD
496	Marsha	Hansen	El Segundo Chamber of Commerce
497	Byron	Nelson Jr.	Hoopa Valley Tribe
498	John	Bosler	Cucamonga Valley Water District
499	Jacklyn	Shaw	
500	Heinrich	Albert	
501	Richard	ANON	
502	Jamie	Bolt	
503	Michael	Brodsky	Save the California Delta Alliance
504	Diane	Burgis	Contra Costa County Board of Supervisors
505	Lenora	Clark	
506	Ray	Cohen	
507	James	Cox	California Striped Bass Association
508	Molly	Culton	Sierra Club of California
509	Darlene	Dawson	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
510	Dominic	DeBellis	
511	Rich	Fitz	
512	Mike	Guzzarro	
513	Jim	Hall	
514	Jan	McCleery	
515	Lisa	Combs	
516	Linda	Hall	
517	Dan	Lively	
518	Mariah	Looney	Restore the Delta
519	Michael	McCleery	
520	Tim	McCabe	
521	Mike	Moran	Big Break Visitors Center
522	Frank	Morgan	
523	Kristin	Olner	
524	Linda	Ormonde	
525	Ray	Qualls	
526	Richard	Pyke	
527	Keri	Richards	
528	Clare	Rickard	
529	Robert	Pyke	
530	Kevin	Romick	Mayor, City of Oakley
531	Paul	Seger	
532	Carla	Sign	
533	Steve	Starratt	
534	Todd	Combs	
535	Vincent	Vargas	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
536	Jerry	Willis	
537	Patricia	Ziobro	
538	Jeffrey	Michael	University of the Pacific, Eberhardt School of Business
539	Michael	Brodsky	Save the California Delta Alliance
540	Cheryl	Madrigal	Rincon Band of Luiseño Indians
541	Donis	Pacini Whaley	Delta Defenders
541	Deirdre	Des Jardins	California Water Research
542	Bruce	Campbell	
543	Greg	Knoblich	
544	Betty	Miller	
545	Loren	Rhodes	
546	Felice	Calderoni	
547	Marjorie	Lutz	
548	Bill	Wilson	
549	Richard	Baum	
549	Maggi	Baum	
551	J. Mark	Myles	County of San Joaquin
552	Nicole	Suard, Esq.	Snug Harbor Resorts LLC
553	Judith	Kirk	
554	Dennis	Park	
555	Jeffrey	Sutton	Tehama Colusa Canal Authority
557	Tim	McCabe	
558	Ed	Schnee	
559	Richard	Stinson	
560	Bradford	Pappalardo	Steamboat Resort
561	Diane	Riddle	State Water Resources Control Board

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
562	Barry	Sgarrella	SolAgra
563	Federico	Barajas	San Luis & Delta-Mendota Water Authority
564	Elsa	Rose	
565	Roger	Marks	
566	Marie	Grant	
567	David	Abelson	
568	Dean	Ruiz	South Delta and Central Delta Water Agencies
569	Karen	Mann	Save the CA Delta Alliance
570	Gary	Bobker	The Bay Institute
570	Rachel	Zwillinger	Defenders of Wildlife
570	Jon	Rosenfield, Ph.D.	San Francisco Baykeeper
570	Doug	Obegi	Natural Resources Defense Council
571	Karen	Jacques	
572	Katja	Irvin	
573	Jennifer	Olguin	
574	Phillip	Merlo	San Joaquin Historical Society & Museum
575	Chloe	McKerr	
576	Kelley	Taber	Sacramento County Water Agency
577	Alexa	Kerr	
578	Jacob	Foley	
579	Genesis	Mendoza	
580	Diana	Garcia	
581	Rachel	Huang	
583	Lorenzo	Castaneda	
584	Georgia	Steinheimer	
585	Phoebe	Lawton	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
586	Miranda	O'Brien	
587	Jennifer	Martinez	
588	Siena	Hooper	
589	Elvia	Cruz	
590	Luis		
591	Cynthia	Torres	
592	Selenia	Segura-Verdin	
593	Gabriel	Van Praag	
594	Arisbeth	Cruz	
595	Arushi	Lakhan-Pao	
596	Malei	Guzman	
597	Dang	Nguyen	
598	Bill	Emlen	Solano County Department of Resource Management
599	Michelle	Huang	
600	Lucas	Brown	
602	Patrick	Porgans	Porgans & Associates
610	Henry	Kuechler	Reclamation District No. 2060
612	Warren	Bogle	Reclamation District 150
614	William	Busath	City of Sacramento
615	Justin	Fredrickson	California Farm Bureau Federation
616	Larry	Gardiner	Brannan-Andrus Levee Maintenance District
617	Bob	Panzer	
618	Gene	Beley	
619	Bob	Panzer	
620	Mark	Pruner	On Behalf of Residents and Members of the Clarksburg Community
621	Susan	Simpson	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
622	Georgia	Goldberg	
623	Carolyn	Graham	
623	Bob	Graham	
624	Gabrielle	Tetreault	
625	Richard	Jamison	
626	Wayne	Smith	Buena Vista Rancheria of Me-Wuk Indians
626	Richard	Hawkins	Buena Vista Rancheria of Me-Wuk Indians
626	Emily	Moloney	Buena Vista Rancheria of Me-Wuk Indians
626	Michael	DeSpain	Buena Vista Rancheria of Me-Wuk Indians
627	Nichelle	Garcia	
628	Jacklyn	Shaw	
629	Mary	Elizabeth	Sierra Club of California
630	Alexandra	Stehl	California Department of Parks and Recreation
632	Robert	Hunter	Municipal Water District of Orange County
634	Chuck	Niessen	
635	Jim	Rich	
636	Julie	Hanson	
637	Osha	Meserve	Local Agencies of the North Delta (Reclamation Districts 3, 150, 551 & 999)
638	Carol	Goldberg	League of women Voters of California
639	Theodora	Atkinson	
646	Jacklyn	Shaw	
662	John	McManus	Golden Gate Salmon Association
663	Alison	Monroe	
664	Roberto	Valdez	
666	Bill	Washburn	
668	Jacklyn	Shaw	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
672	Andrew	McHugh	
673	Jan	Hagen	
674	David	Guy	North State Water Alliance
675	Terrie	Mitchell	Sacramento Regional County Sanitation District
676	Doug	Carpenter	
677	Jeff	McCormack	
678	Marsha	Armstrong	
679	Christopher	Lish	
680	Antal	Kalik	
681	Greg	Sallee	
682	Gail	Lorimer	
683	Jeff	McCormack	Reclamation District 1002
684	Jeff	McCormack	John McCormack Co.
686	Mark	Goble	
687	Linda	Snyder	
688	Alexandra	Perry	
689	Katherine	Fritz	
690	Julio	Rosales	
691	Jennifer	Formoso	
692	Mark	Goble	
693	Scott	Braly	
694	Jim	Provenza	Delta Counties Coalition, Yolo County
694	Patrick	Kennedy	Delta Counties Coalition, Sacramento County Board of Supervisors
694	Skip	Thomson	Delta Counties Coalition, Solano County
694	Chuck	Winn	Delta Counties Coalition, San Joaquin County Board of Supervisors
694	Karen	Mitchoff	Delta Counties Coalition, Contra Costa County Board of Supervisors

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
695	Marlene	Willmes	
696	Deborah	Duenas	
697	Stephen	Brandt	Delta Independent Science Board
697	Jay	Lund	Delta Independent Science Board
697	Elizabeth	Canuel	Delta Independent Science Board
698	Steve	Lambert	Butte County Board of Supervisors
699	Ray	Baca	Engineering Contractors Association
700	Melanie	Barna	
701	Stephan	Volker	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe
702	Frank	Toriello	We Advocate Thorough Environmental Review
703	Gabrielle	Broche	
704	Eric	Jenks	Wilbur-Ellis Company
705	Roger	Mammon	
706	Shelley	Ostrowski	Westlands Water District
707	Elaine	Barut	Little Manila Rising
707	Nathan	Magsayo	Little Manila Rising
707	Gloria	Alonso Cruz	Little Manila Rising
707	AZ	Banguis	Little Manila Rising
707	Julius	Buyco	Little Manila Rising
707	Glenable	Toreno	Little Manila Rising
707	Jerome	Robeles	Little Manila Rising
707	Aleen	Phimpha	Little Manila Rising
708	David	Mooney	U.S. Bureau of Reclamation, Bay-Delta Office
709	Dan	Bacher	
710	Dan	York	American Rivers Water Agencies; Sacramento Suburban Water District

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
710	James	Peifer	American Rivers Water Agencies; Regional Water Authority
710	Andrew	Fecko	American Rivers Water Agencies; Placer County Water Agency
710	Paul	Helliker	American Rivers Water Agencies; San Juan Water District
710	Cathy	Lee	American Rivers Water Agencies; Carmichael Water District
710	Michael	Peterson	American Rivers Water Agencies; Sacramento County Water Agency
710	Jim	Abercrombie	American Rivers Water Agencies; El Dorado Irrigation District
710	Marcus	Yasutake	American Rivers Water Agencies; City of Folsom
710	Sean	Bigley	American Rivers Water Agencies; City of Roseville
710	Bill	Busath	American Rivers Water Agencies; City of Sacramento
711	Ken	Oneto	Sacramento County Farm Bureau
711	John	Viano	Contra Costa County Farm Bureau
711	Sean	Favero	Solano County Farm Bureau
711	Joe	Martinez	Yolo County Farm Bureau
711	David	Strecker	San Joaquin County Farm Bureau
712	Gwen	Cauthren	
713	Mike	Bassi	
714	Sheridan	Enomoto	Greenaction for Health and Environmental Justice
715	Daniel	Wilson	Reclamation District 3
716	Muriah	Kendall	
717	David	Ledger	Shasta Environmental Alliance
718	David	Strecker	San Joaquin County Farm Bureau
719	Anna	Swenson	North Delta C.A.R.E.S.
719	Barbara	Daly	North Delta C.A.R.E.S.
720	Eric	Gillies	California State Lands Commission
721	Michael	McDowell	Double M Farms
722	Barbara	Steinberg	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
723	Charlene	Woodcock	
724	Harvey	Correia	Reclamation District 2067
725	Susan	Wilson	
726	Roger	Cornwell	Sacramento River Settlement Contractors
727	Victoria	Allen	
728	Jem	Hicks	
729	Erik	Vink	Delta Protection Commission
730	Douglas	Chan	Reclamation District 551
730	Kurt	Johnson	Reclamation District 551
730	Topper	van Loben Sels	Reclamation District 551
731	Craig	Hamblin	Fire Chief, Clarksburg Fire Protection District
731	Joe	Gomes	Board of Fire Commissioners/Directors
731	Nancy	Kirchhoff	Board of Fire Commissioners/Directors
731	Steve	Pylman	Board of Fire Commissioners
731	Richard	Bagby	Board of Fire Commissioners
731	Mark	Pruner	Clarksburg Fire Protection District
731	John	Webber	Board of Fire Commission/Directors
723	Mark	Pruner	Friends of the 1883 Clarksburg Schoolhouse
732	Will	Middleton	Friends of the 1883 Clarksburg Schoolhouse
733	Tom	Williams	
734	Richard	Denton, PhD, PE	Richard Denton & Associates
735	Regina	Cuellar	Shingle Springs Band of Miwok Indians
736	Kelley	Taber	County of Sacramento
738	Chase	McCormick	
739	Ray	Brant	
740	Ryan	Hernandez	Contra Costa County Water Agency

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
741	Michelle	Botor	
742	Victor	Rosasco	Water4fish
743	Ralph	Propper	Environmental Council of Sacramento
743	Sean	Wirth	Environmental Council of Sacramento
744	Shivaji	Deshmukh	Inland Empire Utilities Agency
745	Bill	Jennings	California Sportfishing Protection Alliance
745	Jonas	Minton	Planning and Conservation League
745	Carolee	Krieger	California Water Impact Network
745	John	Buse	Center for Biological Diversity
745	Barbara	Vlamis	AquAlliance
745	Robert	Wright	Sierra Club of California
745	Barbara	Barrigan-Parrilla	Restore the Delta
745	Kathryn	Phillips	Sierra Club California
745	Conner	Everts	Environmental Water Caucus
746	Chris	Tooker	Friends of Stone Lakes National Wildlife Refuge
747	Jan	McCleery	Save the California Delta Alliance
748	Norma	Camacho	Santa Clara Valley Water District (SCVWD)
749	Augostina	Duncan	
750	David	Guy	Northern California Water Association
751	Mary Ann	Robinson	
752	Amber	McDowell	Double M Farms
753	Dean	Ruiz	South Delta and Central Delta Water Agencies
754	William	Martin	
755	Jim	Blickenstaff	Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club
756	Eric	Mourelatos	
757	Becky	Donnelly	
759	Dante	Nomellini, Sr.	Central Delta Water Agency

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
767	Kelley	Taber	City of Stockton
768	Jack	Pelley	
769	Richard	Solomon	
770	Arnold	Plonczak	
770	Judi	Collins	
771	Melinda	Terry	California Central Valley Flood Control Association
772	Joseph	Rizzi	
773	Deanna	Sereno	Contra Costa Water District
774	Don	Hankins, Ph.D.	California Indian Water Commission
776	Lawrence	Goldzband	San Francisco Bay Conservation & Development Commission
777	David	Fleming	BizFed
777	Tracy	Hernandez	BizFed
777	Sandy	Sanchez	BizFed
778	Jacklyn	Shaw	
779	Carol	Kennedy	
779	Bobby	Ferreira	
781	Janet	Wall	Wintu Audubon Society
782	Robert	Shaver	Alameda County Water District
783	Mark	Miyoshi	Winnemem Wintu Tribe
784	Rick	Downey	
785	Jim	Blickenstaff	Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club
786	Joseph	Rizzi	
787	William	Huber	
788	Jill	North	
789	Jeff	Henderson	Delta Stewardship Council
791	Arabella	Merlo	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
792	Sarah	Salibury	
793	Rebekah	Olstad	
794	Stacy	Sebring	
796	Byron	Nelson Jr.	Hoopa Valley Tribe
797	John	Bosler, P.E.	Cucamonga Valley Water District
798	David F.	Scatena	
800	Joshua	Grover	California Department of Fish and Wildlife
801	Denise	Louie	
802	Jacklyn	Shaw	
803	Jacklyn	Shaw	
804	Don	Hankins, Ph.D.	
805	Ashwani	Rana	
806	Clifford	Sanburn	
807	Lori	Lafata	
808	Cheyene	DeWeese	
809	Martin	Freitas	
810	Colin	Brodie	
811	Jerry	Willis	
812	Pat	Wolff	
813	Chris	Donnelly	
814	Barbara	Vlamis	AquAlliance
814	Carolee	Krieger	California Water Impact Network
814	Bill	Jennings	California Sportfishing Protection Alliance
815	Gavin	McCreary	California Department of Toxic Substances Control
817	Thomas	Slater	Reclamation District 999
818	John	Hakel	Southern California Partnership for Jobs

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
819	Clyde	Thorington	
820	Clark	Tuthill	
822	Karen	Coffee	
823	Erik	Vink	Delta Protection Commission
824	Christine	Ellis	
825	Joone	Lopez	Moulton Nigel Water District
826	Melinda	Terry	North Delta Water Agency
829	Sherri	Norris	California Indian Environmental Alliance
830	Michelle	Berditschevsky	Mount Shasta Bioregional Ecology Center
830	Janie	Painter	Medicine Lake Citizens for Quality Environment
853	Susan	Alexander	
855	Josephine	Sambado	
856	Daniel	Woody	
857		ANON	
858	Rodney	Deweese	
859	Anita	Jennings	
860	Glen	Caldwell	
861	Clark	Freitas	
862	Sherry	Cole	
863	Anita	Bussell	
864	Christine	Kroger	
865	Phyllis	Bala	
866	Kathleen	Whitefield	
867	Tony	Dunkle	
868	Denece	Vincent	
869	Gary Graham	Hughes	Biofuelwatch

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
870	Gregg	Wrisley	
871	Helene	Sisk	
872	Richard	Huffman	
873	Barbara	Chapman	
874	Bill	Hartman	
875	Sean	Taketa McLauglin	
876	Carlyle	Terry	
877	Katherine	Wright	River Delta Unified School District
878	Richard	Solomon	
879	Inder Preet	Singh	Caltrans
880	Muriel	Strand	
881	Stephen	Rosenblum	
882	Will	Mehrten	
883	Lee	Provost	
884	John David	Hammett	
885	Claudia	Mackey	
886	Barbara	Steinberg	
887	Scott	Mondloch	
888	Joseph	Selby	
889	Todd	Scruggs	
890	Cheyene	DeWeese	
891	Alice	Neuhauser	
892	Anita	Jennings	
893	George Mark	Remelman	
894	Melanie	Barna	
895	Jorge	De Cecco	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
896	Arthur	Fox	
897	Sheryl	Lipari	
898	Linda	Hanson	
899	Terry	Laughlin	
900	Richard	Smart	
901	Michael	Davis	
902	Justin	Raleigh	
903	Edward	Stetson	
904	Janette	Saale-Baehr	
905	Mark	Lambert	
906	Linda	Lambert	
907	Linda	Hall	
908	Susan	Ludwig	
909	Donald	Ludwig	
910	Liz	Earp	
911	Milt	Baehr	
912	Barbara	Chapman	
913	Barbara	Chapman	
914	Jan	McCleery	Save the California Delta Alliance
915	Scott	Van Ausdal	
916	Darrell	Musick	
917	Randall	Gast	
918	Janet	McCleery	
919	Rebecca	Richert	
920	Catherine	Howard	
921	Michael & Marsha	Walsh	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
922	Keith	Ryan	
923	Jennifer	Formoso	
924	ANON	ANON	
925	Riadh	Khairalla	
926	Scott	Pope	
927	Janet	McCleery	
928	Julio	Rosales	
929	John	Carolla	
929	John	Carolla	
930	Barbara	Worden	
931	Jacob	Mor	
932	Don	Person	
933	Charles	Robinson	
934	Stephen	Schmitt	
935	Kim	Desenberg	
936	Sally	Sturney	
937	Tracey	Ziomek	
938	Karen	Schmidt	
939	Marion	McKnight	
940	Anabel	Crouch	
941	Galen	Dobbins	
942	Rene	McCarter	
943	Judith	Richey	
944	Susan	Ludwig	
945	Barbara	Cullen	
946	Marti & David	Cruz	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
947	Michael	Stanaland Sr	
948	Eleanor	Stanaland	
949	Michael	Harris	
950	Juanita	Cannon	
951	David	Moen	
952	Bill	Wells	California Delta Chambers & Visitor's Bureau
953	Janet	McCleery	
954	Janet	McCleery	
955	Donna	Bramble	
956	Betty	Miller	
957	Martin	Freitas	
958	Janet	McCleery	
959	Sandra	Hagerty	
960	John	Hoffman	
961	Jacklyn	Shaw	
962	Les	Kishler	
963	Jon	Jamieson	
964	Stephen	Rosenblum	
965	Patricia	Martin	
966	Du	Ng	
967	Steve	Oragin	
968	Charles	Helfrick	
969	Arthur	Knutson Jr	
970	Mark	Wilson	Wilson Farms & Vineyards
971	Rodger	Silvers	
972	Jeanette	Okuye	Valley Land Alliance

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
973	Laurie	Yglesia	
974	Lynda	Mosher	
975	Craig	Burger	
976	Larry	Hendrickson	
977	Karen	Wilson	
978	Michael	McCleery	
979	Paul	Seger	
981	Adam	ANON	
982	Marijane	Poulton	
983	Kae	Bender	
984	Suzanne	Womack	Clifton Court, L.P.
989	Nancy	Lindholm	Oxnard Chamber of Commerce
990	John	Heffernan	South Bay Association of Chambers of Commerce
991	Deborah	Barmack	Inland Action
992	William J.	Wilson	Rancho California Water District
993	Michelle	Newell	Ventura Economic Development Association
994	Thomas	Flavin	Burbank Chamber of Commerce
995	Donna	Duperron	Torrance Area Chamber of Commerce
996	Shari	McCracken	Butte County
997	Cristina	Mathews	
998	Sean	Cudney	
999	Tara	Beeman	
1000	Alphonsus	Furr	
1001	Walter	Hoppe	
1002	Dr. June	Dampin	
1003	Judy	Johnson	

Letter Number	First Name	Last Name	Agency, Organization or Affiliation
1004	Blythe	Reis	
1004	Mark	DuPont	
1005	Stacy	Sebring	

Appendix A
Notice of Preparation

NOTICE OF PREPARATION

NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT FOR THE DELTA CONVEYANCE PROJECT

January 15, 2020

INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the California Department of Water Resources (DWR) will initiate the preparation of an Environmental Impact Report (EIR) for the Delta Conveyance Project in the Sacramento-San Joaquin Delta, California. DWR is the lead agency under CEQA.

The Delta Conveyance Project will also involve federal agencies that must comply with the National Environmental Policy Act (NEPA), likely requiring the preparation of an environmental impact statement (EIS). Federal agencies with roles with respect to the project may include approvals or permits issued by the Bureau of Reclamation (Reclamation) and United States Army Corps of Engineers. To assist in the anticipated federal agencies' NEPA compliance, DWR will prepare an EIR that includes relevant NEPA information where appropriate. Once the role of the federal lead agency is established, that federal lead agency will publish a Notice of Intent to formally initiate the NEPA process.

BACKGROUND INFORMATION

In July 2017, DWR had previously approved a conveyance project in the Delta involving two tunnels referred to as "California WaterFix." In his State of the State address delivered February 12, 2019, Governor Newsom announced that he did not "support WaterFix as currently configured" but does "support a single tunnel." On April 29, 2019, Governor Newsom issued Executive Order N-10-19, directing several agencies to (among other things), "inventory and assess… [c]urrent planning to modernize conveyance through the Bay Delta with a new single tunnel project." The Governor's announcement and Executive Order led to DWR's withdrawal of all approvals and environmental compliance documentation associated with California WaterFix. The CEQA process identified in this notice for the proposed Delta Conveyance Project will, as appropriate, utilize relevant information from the past environmental planning process for California WaterFix but the proposed project will undergo a new stand-alone environmental analysis leading to issuance of a new EIR.

PROPOSED DELTA CONVEYANCE PROJECT DESCRIPTION

Purpose and Project Objectives

CEQA requires that an EIR contain a "statement of the objectives sought by the proposed project." Under CEQA, "[a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers

in preparing findings or a statement of overriding considerations. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits" (State CEQA Guidelines Section 15124[b]).

Here, as the CEQA lead agency, DWR's underlying, or fundamental, purpose in proposing the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State's Water Resilience Portfolio.

The above stated purpose, in turn, gives rise to several project objectives. In proposing to make physical improvements to the SWP Delta conveyance system, the project objectives are:

- To address anticipated rising sea levels and other reasonably foreseeable consequences of climate change and extreme weather events.
- To minimize the potential for public health and safety impacts from reduced quantity and quality of SWP water deliveries, and potentially CVP water deliveries, south of the Delta resulting from a major earthquake that causes breaching of Delta levees and the inundation of brackish water into the areas in which the existing SWP and CVP pumping plants operate in the southern Delta.
- To protect the ability of the SWP, and potentially the CVP, to deliver water when hydrologic conditions result in the availability of sufficient amounts, consistent with the requirements of state and federal law, including the California and federal Endangered Species Acts and Delta Reform Act, as well as the terms and conditions of water delivery contracts and other existing applicable agreements.
- To provide operational flexibility to improve aquatic conditions in the Delta and better manage risks of further regulatory constraints on project operations.[1]

Description of Proposed Project Facilities

The existing SWP Delta water conveyance facilities, which include Clifton Court Forebay and the Banks Pumping Plant in the south Delta, enable DWR to divert water and lift it into the California Aqueduct. The proposed project would construct and operate new conveyance facilities in the Delta that would add to the existing SWP infrastructure. New intake facilities as points of diversion would be located in the north Delta along the Sacramento River between Freeport and the confluence with Sutter Slough. The new conveyance facilities would include a tunnel to convey water from the new intakes to the existing Banks Pumping Plant and potentially the federal Jones Pumping Plant in the south Delta. The new facilities would provide an alternate location for diversion of water from the Delta and would be operated in coordination with the existing south Delta pumping facilities, resulting in a system also known as "dual conveyance"

[1] These objectives are subject to refinement during the process of preparing a Draft EIR.

because there would be two complementary methods to divert and convey water. New facilities proposed for the Delta Conveyance Project include, but are not limited to, the following:

- Intake facilities on the Sacramento River
- Tunnel reaches and tunnel shafts
- Forebays
- Pumping plant
- South Delta Conveyance Facilities

Figure 1 shows the areas under consideration for these facilities. Other ancillary facilities may be constructed to support construction of the conveyance facilities including, but not limited to, access roads, barge unloading facilities, concrete batch plants, fuel stations, mitigation areas, and power transmission and/or distribution lines.

Under the proposed project, the new north Delta facilities would be sized to convey up to 6,000 cfs of water from the Sacramento River to the SWP facilities in the south Delta (with alternatives of different flow rates, as described in the "Alternatives" section below). DWR would operate the proposed north Delta facilities and the existing south Delta facilities in compliance with all state and federal regulatory requirements and would not reduce DWR's current ability to meet standards in the Delta to protect biological resources and water quality for beneficial uses. Operations of the conveyance facilities are proposed to increase DWR's ability to capture water during high flow events. Although initial operating criteria of the proposed project would be formulated during the preparation of the upcoming Draft EIR in order to assess potential environmental impacts and mitigation, final project operations would be determined after completion of the CEQA process, obtaining appropriate water right approvals through the State Water Resources Control Board's change in point of diversion process, and completing the consultation and review requirements of the federal Endangered Species Act and California Endangered Species Act. Construction and commissioning of the overall conveyance project, if approved, would take approximately 13 years, but the duration of construction at most locations would vary and would not extend for this full construction period.

Reclamation is considering the potential option to involve the CVP in the Delta Conveyance Project. Because of this possibility, the connection to the existing Jones Pumping Plant in the south Delta is included in the proposed facility descriptions below. The proposed project may include a portion of the overall capacity dedicated for CVP use, or it may accommodate CVP use of available capacity (when not used by SWP participants). If Reclamation determines that there could be a role for the CVP in the Delta Conveyance Project, this role would be identified in a separate NEPA Notice of Intent issued by Reclamation.

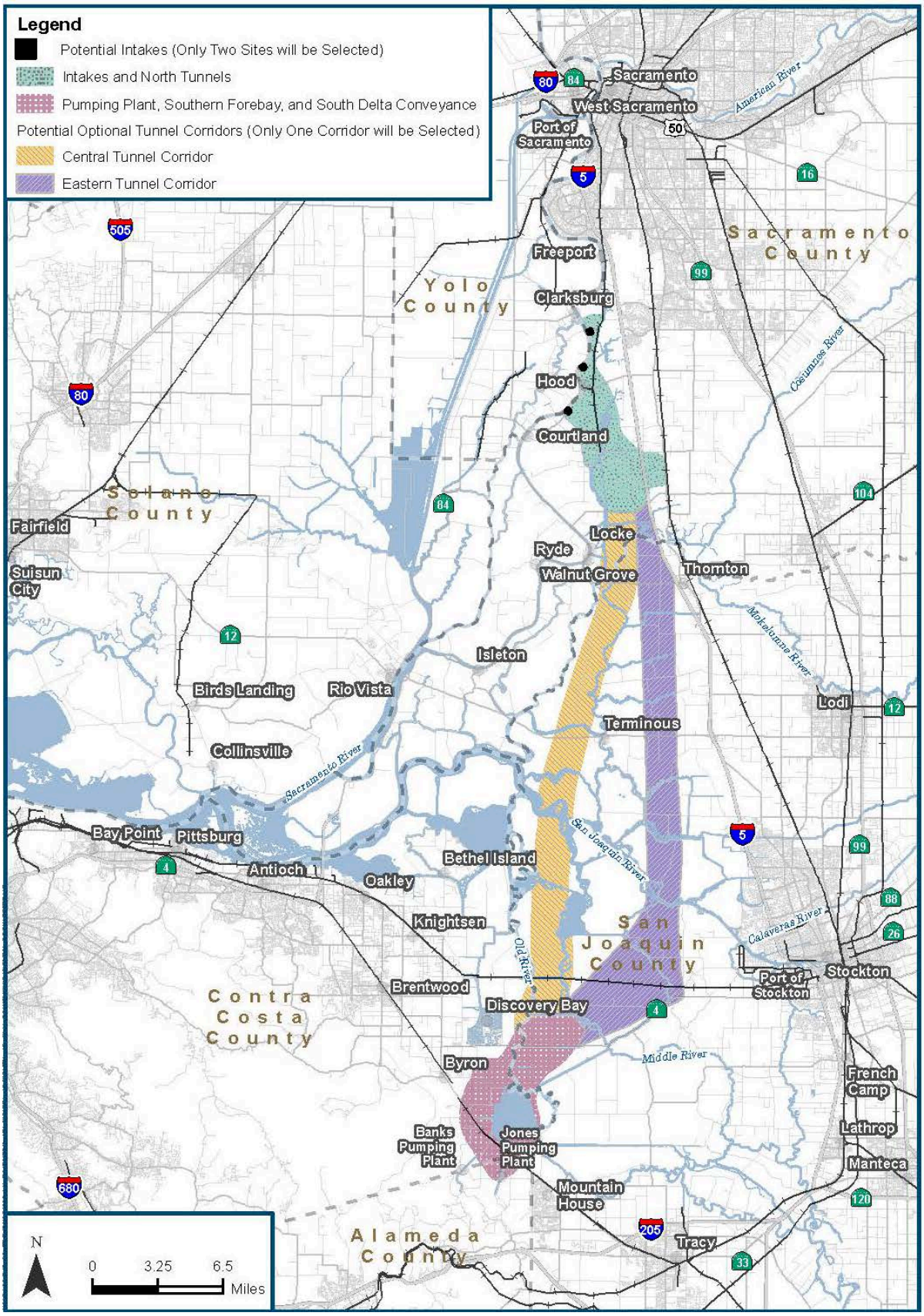


Figure 1. Proposed Project Facility Corridor Options

Intake Facilities

The proposed intake facilities would be located along the Sacramento River between Freeport and the confluence with Sutter Slough, as shown in Figure 1. The proposed project would include two intakes with a maximum diversion capacity of about 3,000 cfs each. The size of each intake location could range from 75 to 150 acres, depending upon fish screen selection, along the Sacramento River and include a state-of-the-art fish screen, sedimentation basins, tunnel shaft, and ancillary facilities. An additional 40 to 60 acres at each intake location would be temporarily disturbed for staging of construction facilities, materials storage, and a concrete batch plant, if needed.

Tunnel and Tunnel Shafts

The proposed project would construct up to two north connecting tunnel reaches to connect the intakes to an Intermediate Forebay (see "Forebays" section below), a single main tunnel from the Intermediate Forebay to a new Southern Forebay, and two connecting south tunnel reaches as part of the proposed project's South Delta Conveyance Facilities (see "South Delta Conveyance Facilities" section below) to connect to the existing SWP and, potentially CVP, facilities in the south Delta. The single main tunnel would follow one of two potential optional corridors as shown in Figure 1.

The proposed single main tunnel and connecting tunnel reaches would be constructed underground with the bottom of the tunnel at approximately 190 feet below the ground surface. Construction for the tunnel would require a series of launch shafts and retrieval shafts. Each launch and retrieval shaft site would require a permanent area of about four acres. Launch sites would involve temporary use of up to about 400 acres for construction staging and material storage. Depending on the location, the shafts may also require flood protection facilities to extend up to about 45 feet above the existing ground surface to avoid water from entering the tunnel from the ground surface if the area was flooded. Earthen material would be removed from below the ground surface as tunnel construction progresses; this reusable tunnel material could be reused for embankments or other purposes in the Delta or stored near the launch shaft locations.

Forebays

The proposed project would include an Intermediate Forebay and a Southern Forebay. The Intermediate Forebay would provide potential operational benefits and would be located along the tunnel corridor between the intakes and the pumping plant. The Southern Forebay would be located at the southern end of the single main tunnel and would facilitate conveyance to the existing SWP pumping facility and, potentially the CVP pumping facilities. The forebays would be constructed above the ground, and not within an existing water body. The size of the Intermediate Forebay would be approximately 100 acres with an additional 150 acres disturbed during construction for material and equipment storage, and reusable tunnel material storage. The embankments would be approximately 30 feet above the existing ground surface. Additional appurtenant structures, including a permanent crane, would extend up to 40 feet above the embankments.

The Southern Forebay would be located near the existing Clifton Court Forebay and would be approximately 900 acres with an additional 200 acres disturbed during construction for material and equipment storage, potential loading and offloading facilities, and reusable tunnel material storage. The Southern Forebay embankments would be up to 30 feet above the existing ground surface.

Pumping Plant

The proposed project would include a pumping plant located at the new Southern Forebay and would receive the water through the single main tunnel for discharge in the Southern Forebay. The pumping plant would be approximately 25 acres along the side of the Southern Forebay and would include support structures, with a permanent crane for maintenance as the highest feature that would extend approximately 70 feet above the existing ground surface. The temporary and permanent disturbed area for the pumping plant is included in the Southern Forebay area, described above.

South Delta Conveyance Facilities

The proposed project would include South Delta Conveyance Facilities that would extend from the new Southern Forebay to the existing Banks Pumping Plant inlet channel. The connection to the existing Banks Pumping Plant would be via canals with two tunnels to cross under the Byron Highway. The canals and associated control structures would be located over approximately 125 to 150 acres. Approximately 40 to 60 additional acres would be disturbed temporarily during construction. These facilities could also be used to connect the Southern Forebay to the CVP's Jones Pumping Plant.

Contract Amendment for Delta Conveyance

The proposed project may involve modifications to one or more of the State Water Resources Development System (commonly referred to as the SWP) water supply contracts to incorporate the Delta Conveyance Project. Therefore, if modifications move forward, the Delta Conveyance Project EIR will assess, as part of the proposed project, potential environmental impacts associated with reasonably foreseeable potential contract modifications.

PROJECT AREA

The proposed EIR project area for evaluation of impacts consists of the following three geographic regions, as shown in Figure 2, below.

- Upstream of the Delta region
- Statutory Delta (California Water Code Section 12220)
- South-of-Delta SWP Service Areas and, potentially, South-of-Delta CVP Service Areas.

The study areas will be specifically defined for each resource area evaluated in the EIR. Figure 3 shows the SWP South-of-Delta water contractors.



Figure 2. Project Area

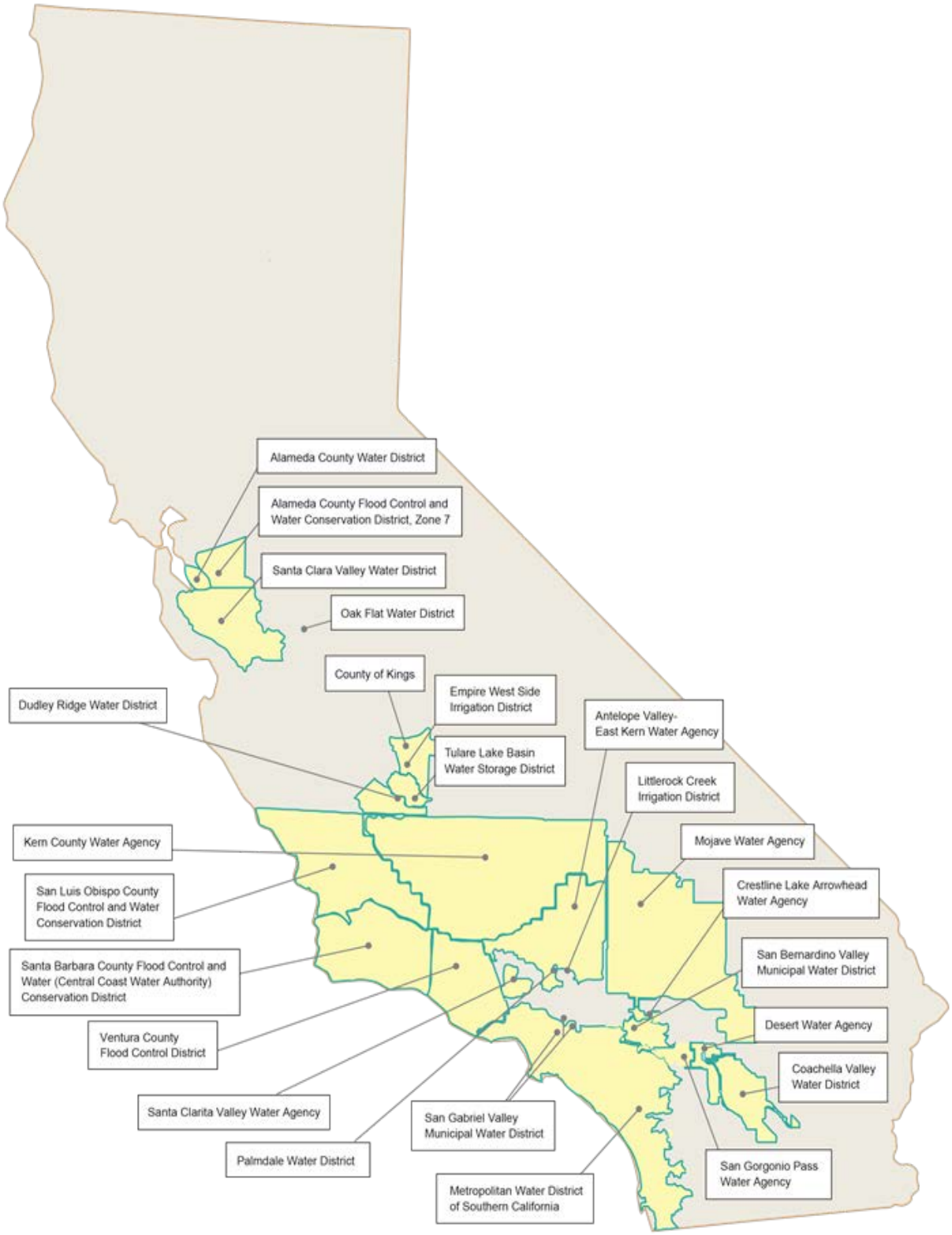


Figure 3. SWP South-of-Delta Service Areas

ALTERNATIVES

As described above, the proposed project has been informed by past efforts taken within the Delta and the watersheds of the Sacramento and San Joaquin Rivers, including those undertaken through the Bay Delta Conservation Plan (BDCP)/California WaterFix. As stated in CEQA Guidelines Section 15126.6(a), the "EIR shall describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."

The scoping process will inform preliminary locations, corridors, capacities and operations of new conveyance facilities to be evaluated in the EIR. In identifying the possible EIR alternatives to be analyzed in detail, DWR is currently considering alternatives with capacities that range from 3,000 to 7,500 cfs, with varying degrees of involvement of the CVP, including no involvement. DWR will make its final choice of potentially feasible alternatives to include in the Draft EIR after receipt of scoping comments.

POTENTIAL ENVIRONMENTAL EFFECTS

DWR as the lead agency will describe and analyze the significant environmental effects of the proposed project. DWR did not prepare an initial study so none is attached; the EIR will include the suite of resource categories contained in Appendix G of CEQA Guidelines. Probable effects may include:

- Water Supply: changes in water deliveries.
- Surface Water: changes in river flows in the Delta.
- Groundwater: potential effects to groundwater levels during operation.
- Water Quality: changes to water quality constituents and/or concentrations from operation of facilities.
- Geology and Seismicity: changes in risk of settlement during construction.
- Soils: changes in topsoil associated with construction of the water conveyance facilities.
- Fish and Aquatic Resources: effects to fish and aquatic resources from construction and operation of the water conveyance facilities.
- Terrestrial Biological Resources: effects to terrestrial species due to construction of the water conveyance facilities.
- Land Use: incompatibilities with land use designations.
- Agricultural and Forestry Resources: preservation or conversion of farmland.
- Recreation: displacement and reduction of recreation sites.
- Aesthetics and Visual Resources: effects to scenic views because of water conveyance facilities.
- Cultural and Tribal Cultural Resources: effects to archeological and historical sites and tribal cultural resources.
- Transportation: vehicle miles traveled; effects on road and marine traffic.

- Public Services and Utilities: effects to regional or local utilities.
- Energy: changes to energy use from construction and operation of facilities.
- Air Quality and Greenhouse Gas: changes in criteria pollutant emissions and localized particulate matter from construction and greenhouse gas emissions.
- Noise: changes in noise and vibration from construction and operation of the facilities.
- Hazards and Hazardous Materials: potential conflicts with hazardous sites.
- Public Health: changes to surface water could potentially increase concerns about mosquito-borne diseases
- Mineral Resources: changes in availability of natural gas wells due to construction of the water conveyance facilities.
- Paleontological Resources: effects to paleontological resources due to excavation for borrow and for construction of tunnels and canals.
- Climate Change: increase resiliency to respond to climate change
- Growth Inducement and Other Indirect Effects: changes to land uses as a result of changes in water availability resulting from changes in water supply deliveries

Where the potential to cause significant environmental impacts are identified, the EIR will identify avoidance, minimization, or mitigation measures that avoid or substantially lessen those impacts.

ADDITIONAL BACKGROUND INFORMATION

DWR previously studied a similar project through efforts on the BDCP and subsequently the California WaterFix. The proposed Delta Conveyance Project is a new project and is not supplemental to these past efforts or tiered from previous environmental compliance documents. This section provides background on these past efforts.

In October 2006, various state and federal agencies, water contractors, and other stakeholders initiated a process to develop what became known as the BDCP to advance the objectives of contributing to the restoration of ecological functions in the Delta and improving water supply reliability for the SWP and CVP Delta operations in the State of California.

In December 2013, after several years of preparation, DWR, Reclamation, the United States Fish and Wildlife Service, and the National Marine Fisheries Service, acting as joint lead agencies under CEQA and NEPA, published a draft of the BDCP and an associated Draft EIR/EIS. The Draft EIR/EIS analyzed a total of 15 action alternatives, including Alternative 4, which was identified as DWR's preferred alternative at that time.

In July of 2015, after taking public and agency input into account, the lead agencies formulated three new sub-alternatives (2D, 4A, 5A) and released a Partially Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS) for public comment. Alternative 4A, which is known as "California WaterFix" was identified as DWR and Reclamation's preferred alternative in the RDEIR/SDEIS.

On July 21, 2017, DWR certified the Final EIR and approved California WaterFix. Following

that approval, DWR continued to further refine the project, resulting in reductions to environmental impacts. These project refinements required additional CEQA/NEPA documentation.

On January 23, 2018, DWR submitted an addendum summarizing proposed project modifications to California WaterFix associated with refinements to the transmission line corridors proposed by the Sacramento Municipal Utility District. The Addendum described the design of the applicable modified California WaterFix power features, proposed modifications to those power features (including an explanation of the need for the modifications), the expected benefits of the modifications to the transmission lines, and potential environmental effects as a result of those power related modifications (as compared to the impacts analyzed in the certified Final EIR).

On July 18, 2018, DWR released the California WaterFix Draft Supplemental EIR, which evaluated proposed changes to the certain conveyance facilities of the approved project. (No Final Supplemental EIR was ever completed, due to the change in direction dictated by Governor Newsom's State of the State speech and Executive Order N-10-19.) On September 21, 2018, Reclamation issued the California WaterFix Draft Supplemental EIS, including an alternatives comparison.

SCOPING MEETINGS

The proposed project is of statewide, regional or area-wide significance; therefore, a CEQA scoping meeting is required pursuant to Public Resources Code Section 21083.9, subdivision (a)(2). Public Scoping meetings are scheduled to take place at the following times and locations:

- Monday, February 3, 2020, 1 p.m. – 3 p.m. California Environmental Protection Agency Building, 1001 I Street, Sacramento
- Wednesday, February 5, 2020, 6 p.m. – 8 p.m. Junipero Serra State Building, 320 West Fourth Street, Los Angeles
- Monday, February 10, 2020, 6 p.m. – 8 p.m. Jean Harvie Community Center, 14273 River Road, Walnut Grove
- Wednesday, February 12, 2020, 6 p.m. – 8 p.m. Santa Clara Valley Water District Board Room, 5750 Almaden Expressway, San Jose
- Thursday, February 13, 2020, 6 p.m. – 8 p.m. San Joaquin Council of Governments Board Room, 555 Weber Avenue, Stockton
- Wednesday, February 19, 2020, 6 p.m. – 8 p.m. Clarksburg Middle School Auditorium, 52870 Netherlands Road, Clarksburg
- Thursday, February 20, 2020, 6 p.m. – 8 p.m. Brentwood Community Center Conference Room, 35 Oak Street, Brentwood

Anyone interested in more information concerning the EIR process, or anyone who has information concerning the study or suggestions as to significant issues, should contact Marcus Yee at (916) 651-6736.

WRITTEN COMMENTS

This notice is being furnished to obtain suggestions and information from other agencies and the public on the scope of issues and alternatives to consider in developing the EIR. The primary purpose of the scoping process is to identify important issues raised by the public and responsible and trustee public agencies related to the issuance of regulatory permits and authorizations and natural resource protection. Written comments from interested parties are invited to ensure that the full range of environmental issues related to the development of the EIR are identified. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Written comments on this part of the Scoping process will be accepted until 5 p.m. on March 20, 2020 and can be submitted in several ways:

- Via email: DeltaConveyanceScoping@water.ca.gov
- Via Mail: Delta Conveyance Scoping Comments, Attn: Renee Rodriguez, Department of Water Resources, P.O. Box 942836, Sacramento, CA 94236

As required by the CEQA Guidelines, within 30 days after receiving the Notice of Preparation, each responsible and trustee agency is required to provide the lead agency with specific detail about the scope, significant environmental issues, reasonable alternatives, and mitigation measures related to the responsible or trustee agency's area of statutory responsibility that will need to be explored in the EIR. In the response, responsible and trustee agencies should indicate their respective level of responsibility for the project.

PLEASE NOTE: DWR's practice is to make the entirety of comments received a part of the public record. Therefore names, home addresses, home phone numbers, and email addresses of commenters, if included in the response, will be made part of the record available for public review. Individual commenters may request that DWR withhold their name and/or home addresses, etc., but if you wish DWR to consider withholding this information you must state this prominently at the beginning of your comments. In the absence of this written request, this information will be made part of the record for public review. DWR will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of, or officials of, organizations or businesses, available for public inspection in their entirety.

Appendix B

Public Noticing Documents

Appendix B.1

County Clerk Notices

Memorandum

Date:	January 15, 2020
To:	County Clerk
Subject:	**Notice of Preparation for Delta Conveyance Project Environmental Impact Report**

Effective January 15, 2020, the Notice of Preparation (NOP) for the Delta Conveyance Project Environmental Impact Report is available for public review and comment. The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the California Environmental Quality Act (CEQA) review.

Pursuant to the requirements of CEQA, it is requested that you make the NOP available for public review through March 20, 2020. Enclosed are the requested copies of the NOP and signed Notice of Completion. Please send a receipt of document arrival in the self-addressed stamped envelope. Additionally, please post the enclosed flyer in a location designated for public notices. If you have any questions, please contact Marcus Yee, Delta Conveyance Office, at (916) 651-6736.

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Delta Conveyance Project

Lead Agency: California Department of Water Resources — Contact Person: Marcus Yee
Mailing Address: 901 P St — Phone: (916) 651-6736
City: Sacramento — Zip: 95814 — County: Sacramento

Project Location: County: Yolo, Sacramento, Solano, San Joaquin, Contra Costa, Alameda — City/Nearest Community: Legal Delta
Cross Streets: Area from south of the Town of Freeport to just north of Bethany Reservoir, and stretches from west of Interstate 5 to east of State Route 160 — Zip Code:
Longitude/Latitude (degrees, minutes and seconds): 38 ° 21 ' 24.03 " N / 121 ° 31 ' 30.64 " W Total Acres:
Assessor's Parcel No.: — Section: — Twp.: — Range: — Base:
Within 2 Miles: State Hwy #: I-5, SR-160, Hwy 4 — Waterways: Sacramento River, San Joaquin River, the legal Delta
Airports: — Railways: — Schools:

Document Type:

CEQA: ☒ NOP ☐ Draft EIR — NEPA: ☐ NOI — Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other:
☐ Mit Neg Dec Other: ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other:

Development Type:

☐ Residential: Units Acres
☐ Office: Sq.ft. Acres Employees ☐ Transportation: Type
☐ Commercial: Sq.ft. Acres Employees ☐ Mining: Mineral
☐ Industrial: Sq.ft. Acres Employees ☐ Power: Type MW
☐ Educational: ☐ Waste Treatment: Type MGD
☐ Recreational: ☐ Hazardous Waste: Type
☒ Water Facilities: Type Diversion/Water Conveyance MGD ☐ Other:

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☒ Agricultural Land ☐ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☒ Wetland/Riparian
☒ Biological Resources ☒ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☐ Solid Waste ☒ Land Use
☐ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☒ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Other: Surface Water, Climate Change, Paleontol

Present Land Use/Zoning/General Plan Designation:

Varies between counties

Project Description: *(please use a separate page if necessary)*

See Attached Project Description

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

X	Air Resources Board	X	Office of Historic Preservation
X	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	X	Parks & Recreation, Department of
	California Highway Patrol	X	Pesticide Regulation, Department of
X	Caltrans District # 3, 4, 10	X	Public Utilities Commission
	Caltrans Division of Aeronautics	X	Regional WQCB # 5
	Caltrans Planning		Resources Agency
X	Central Valley Flood Protection Board		Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy	X	S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
X	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of	X	State Lands Commission
X	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of	X	SWRCB: Water Quality
X	Energy Commission	X	SWRCB: Water Rights
X	Fish & Game Region # 2, 3		Tahoe Regional Planning Agency
X	Food & Agriculture, Department of	X	Toxic Substances Control, Department of
	Forestry and Fire Protection, Department of		Water Resources, Department of
	General Services, Department of		
X	Health Services, Department of	X	Other: CA Dept. of Public Health
	Housing & Community Development	X	Other: Delta Stewardship Council
X	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date January 15th, 2020 Ending Date March 20th, 2020

Lead Agency (Complete if applicable):

Consulting Firm: _____
Address: _____
City/State/Zip: _____
Contact: _____
Phone: _____

Applicant: California Department of Water Resources
Address: 901 P St
City/State/Zip: Sacramento, CA 95814
Phone: (916) 651-6736

Signature of Lead Agency Representative: _____ **Date:** 1/14/20

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Appendix B.2
Newspaper Notices

Contra Costa Times
2850 Shadelands Dr., Ste. 101
Walnut Creek, CA 94598
925-943-8019

3781017

DEPT OF WATER RESOURCES
CHRISTOPHER GEACH
P.O. BOX 942836
SACRAMENTO, CA 94236-0001

PROOF OF PUBLICATION

FILE NO. CEQA Delta Conveyance EIR

In the matter of

Contra Costa Times

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Contra Costa Times, a newspaper published in the English language in the City of Walnut Creek, County of Contra Costa, State of California.

I declare that the Contra Costa Times is a newspaper of general circulation as defined by the laws of the State of California as determined by court decree dated October 22, 1934, Case Number 19764. Said decree states that the Contra Costa Times is adjudged to be a newspaper of general circulation for the City of Walnut Creek, County of Contra Costa and State of California. Said order has not been revoked.

I declare that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

01/16/2020

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.
On this 16th day of January, 2020.

Signature

Legal No. **0006434309**

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

Accessing the Documents and Public Scoping Meetings: Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, and public scoping meetings can be viewed online at: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning. A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov. For questions regarding how to attend a scoping meeting please contact Marcus Yee at 916-651-6736.

CCT #6434309; Jan. 16, 2020

Woodland Daily Democrat
711 Main Street
Woodland, CA 95695
530-406-6223
legals@dailydemocrat.com

3821606

MARCUS YEE
BONDERSON BUILDING
901 P STREET
SACRAMENTO, CA 95814

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
COUNTY OF YOLO

FILE NO. DeltaConveyance_Public Notice 2

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the Legal Advertising Clerk of the printer and publisher of The Daily Democrat, a newspaper published in the English language in the City of Woodland, County of Yolo, State of California.

I declare that the Daily Democrat is a newspaper of general circulation as defined by the laws of the State of California as determined by this court's order dated June 30, 1952 in the action entitled In the Matter of the Ascertainment and Establishment of the Standing of The Daily Democrat as a Newspaper of General Circulation, Case Number 12659. Said order states "The Daily Democrat" has been established, printed and published in the City of Woodland, County of Yolo, State of California; That it is a newspaper published daily for the dissemination of local and telegraphic news and intelligence of general character and has a bona fide subscription list of paying subscribers; and...THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:...That "The Daily Democrat" is a newspaper of general circulation for the City of Woodland, County of Yolo, California. Said order has not been revoked.

I declare that this notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

01/15/2020

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Woodland, California, this
15th day of January 2020

(Signature) Jill Teer

Legal No. **0006447041**

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled
The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

Accessing the Documents and Public Scoping Meetings:
Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, and public scoping meetings can be viewed online at: https://water.ca.gov /Programs /State-Water-Project/ Delta-Conveyance/ Environmental-Planning. A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov. For questions regarding how to attend a scoping

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Solano

I am a citizen of the United States and a resident of Solano County. I am over the age of eighteen years and not a party to, or interested in, this Legal or Public Notice matter, I am the principal Legal Advertising Clerk for the

DAILY REPUBLIC
1250 Texas Street
P.O. Box 47
Fairfield, CA 94533

a newspaper of general circulation printed and published mornings, daily and Sunday, in the City of Fairfield, County of Solano, which has been adjudged a newspaper of general circulation by the Superior Court of the County of Solano, State of California, Case Number 25875, on June 30, 1952.

I certify under penalty of perjury that the attached Legal or Public Notice has been published in each regular and entire issue of the Daily Republic, and not in any supplement, on the following date(s):

January 16,

in the year: 2020

By: Lana Vargas

Lana Vargas, Legal Advertising Clerk /

Date: January 16, 2020

This Space For Filing Stamp

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

Accessing the Documents and Public Scoping Meetings: Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, and public scoping meetings can be viewed online at: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning. A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov. For questions regarding how to attend a scoping meeting please contact Marcus Yee at 916-651-6736.
DR# 00035699
Published: January 16, 2020

Los Angeles Times
MEDIA GROUP

Order ID: 7652870

* Agency Commission not included

GROSS PRICE * : **$1,806.33**

PACKAGE NAME: Legal-Notices

Product(s): Los Angeles Times, CApublicnotice.com
AdSize(s): 2 Column, 3 Column
Run Date(s): Wednesday, January 15, 2020
Color Spec. B/W

Preview

LEGAL NOTICE

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

Accessing the Documents and Public Scoping Meetings: Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, and public scoping meetings can be viewed online at: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning. A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov. For questions regarding how to attend a scoping meeting please contact Marcus Yee at 916-651-6736.

Published in the Los Angeles Times on: January 15, 2020

THE SACRAMENTO BEE
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AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Depth
339807	0004529278	Delta Conveyance Environmental Review Initiated	Legal Notice	$393.18	1	3.81 In

Attention: Connor Block

DEPT. OF WATER RESOURCES
1416 NINTH STREET RM 340
SACRAMENTO, CA 95814

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: Delta ConveyanceScoping@water.ca.gov

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DECLARATION OF PUBLICATION
(C.C.P.2015.5)

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the printer and principal clerk of the publisher of The Sacramento Bee, printed and published in the City of Sacramento, County of Sacramento, State of California, daily, for which said newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Sacramento, State of California, under the date of September 26, 1994, Action No. 379071; that the notice of which the annexed is a printed copy, has been published in each issue thereof and not in any supplement thereof on the following dates, to wit:

1 Insertions

Published On:
January 16, 2020

Legals Clerk

COUNTY OF DALLAS
STATE OF TEXAS

I certify (or declare) under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Sacramento, California, on **January 16, 2020**.

Notary Public

LIZBETH AILEEN CORDERO
My Notary ID # 131868068
Expires January 25, 2023

Extra charge for lost or duplicate affidavits. Legal document please do not destroy!

San Jose Mercury News
4 N. 2nd Street, Suite 800
San Jose, CA 95113
408-920-5332

3781017

DEPT OF WATER RESOURCES
CHRISTOPHER GEACH
P.O. BOX 942836
SACRAMENTO, CA 94236-0001

PROOF OF PUBLICATION
IN THE CITY OF SAN JOSE
IN THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

FILE NO. C. Geach: Delta Conveyance Scoping
In the matter of

San Jose Mercury News

The undersigned, being first duly sworn, deposes and says: That at all times hereinafter mentioned affiant was and still is a citizen of the United States, over the age of eighteen years, and not a party to or interested in the above entitled proceedings; and was at and during all said times and still is the principal clerk of the printer and publisher of the San Jose Mercury News, a newspaper of general circulation printed and published daily in the City of San Jose, County of Santa Clara, State of California as determined by the court's decree dated June 27, 1952, Case Numbers 84096 and 84097, and that said San Jose Mercury News is and was at all times herein mentioned a newspaper of general circulation as that term is defined by Sections 6000; that at all times said newspaper has been established, printed and published in the said County and State at regular intervals for more than one year preceding the first publication of the notice herein mentioned. Said decree has not been revoked, vacated or set aside.

I declare that the notice, of which the annexed is a true printed copy, has been published in each regular or entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

01/16/2020

Dated at San Jose, California
January 16, 2020

I declare under penalty of perjury that the foregoing is true and correct.

Principal clerk of the printer and publisher of the San Jose Mercury News

Legal No. **0006446998**

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

Accessing the Documents and Public Scoping Meetings: Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, and public scoping meetings can be viewed online at: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning. A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov. For questions regarding how to attend a scoping meeting please contact Marcus Yee at 916-651-6736.

SJMN#6446998; January 16, 2020

THE RECORD
PROOF OF PUBLICATION

STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

THE UNDERSIGNED SAYS:

I am a citizen of the United States and a resident of San Joaquin County; I am over the age of 18 years and not a part to or interested in the above-entitled matter. I am the principal clerk of the printer of THE RECORD, a newspaper of general publication, printed and published daily in the City of Stockton, County of San Joaquin by the Superior Court of the County of San Joaquin, State of California, under the date of February 26, 1952, File No. 52857, San Joaquin County Records; that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published each regular and entire issue of said newspaper and not in any supplement thereof on the following dates,
To wit,

January 16 2020

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 16, 2020 In Stockton California

Delailah Little,
The Record

0000175882

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources (DWR) has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review. DWR is accepting comments on the scope of the EIR through March 20, 2020. Written comments can be mailed to: Delta Conveyance Scoping Comments; Attn: Renee Rodriguez, Department of Water Resources; P.O. Box 942836 Sacramento CA 94236. Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

Accessing the Documents and Public Scoping Meetings: Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, and public scoping meetings can be viewed online at: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning. A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov. For questions regarding how to attend a scoping meeting please contact Marcus Yee at 916-651-6736.

#175882 1/16/20

Appendix B.3
Library Notices

Memorandum

Date:	January 15, 2020
To:	Library Clerk/Reference Desk
Subject:	**Notice of Preparation for Delta Conveyance Project Environmental Impact Report**

Effective January 15, 2020, the Notice of Preparation (NOP) for the Delta Conveyance Project Environmental Impact Report is available for public review and comment. The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the California Environmental Quality Act (CEQA) review.

Consistent with the requirements of CEQA, it is requested that you make the enclosed NOP available for public review through March 20, 2020. In addition, please post the enclosed flyer in a location designated for public notices through March 20, 2020. If you have any questions, please contact Marcus Yee, Delta Conveyance Office, at (916) 651-6736.

Appendix B.4
Letters

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

January 14, 2020

To Whom It May Concern:

The Department of Water Resources (DWR) is releasing a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA). Modernizing Delta conveyance is part of the state's Water Resilience Portfolio, which describes the framework to address California's water challenges and support long-term water resilience and ecosystem health.

The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review, including the potential environmental impacts of the proposed single tunnel conveyance project and range of alternatives that will be analyzed in the EIR.

Public participation is an important component of the environmental review process, providing an opportunity for public and community input to be reflected in development of the EIR. DWR is currently accepting comments on the scope of the EIR through March 20, 2020. Comments may be submitted in several ways:

Written comments can be mailed to:

Delta Conveyance Scoping Comments
Attn: Renee Rodriguez, Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Comments can be emailed to: DeltaConveyanceScoping@water.ca.gov

The public is also invited to attend one of the several public scoping meetings to get information, ask questions and submit comments on the scope of the EIR.

Public Scoping Meetings

SACRAMENTO
Monday, February 3, 2020
1 p.m. – 3 p.m.
CA EPA Building
1001 I Street
Sacramento, CA 95814

STOCKTON
Thursday, February 13, 2020
6 p.m. – 8 p.m.
San Joaquin Council of Governments, Board Room
555 Weber Avenue
Stockton, CA 95202

LOS ANGELES
Wednesday, February 5, 2020
6 p.m. – 8 p.m.
Junipero Serra State Building
320 West Fourth Street
Los Angeles, CA 90013

CLARKSBURG
Wednesday, February 19, 2020
6 p.m. – 8 p.m.
Clarksburg Middle School Auditorium
52870 Netherlands Road
Clarksburg, CA 95612

WALNUT GROVE
Monday, February 10, 2020
6 p.m. – 8 p.m.
Jean Harvie Community Center
14273 River Road
Walnut Grove, CA 95690

BRENTWOOD
Thursday, February 20, 2020
6 p.m. – 8 p.m.
Brentwood Community Ctr, Conference Room
35 Oak Street
Brentwood, CA 94513

SAN JOSE
Wednesday, February 12, 2020
6 p.m. – 8 p.m.
Santa Clara Valley Water District, Board Room
5750 Almaden Expressway
San Jose, CA 95118

Additional information regarding Delta conveyance, including the Notice of Preparation and related availability and informational materials, can be viewed online at: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning.

For additional information or any questions, please contact: (916) 651-9569.

Sincerely,



Marcus Yee
Program Manager
Delta Conveyance Office
California Department of Water Resources

Enclosure: Notice of Preparation of the Environmental Impact Report for the Delta Conveyance Project

Appendix B.5
Postcard

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA).

The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review, including the potential environmental impacts of the proposed single tunnel conveyance project and range of alternatives that will be analyzed in the EIR.

To view the Notice of Preparation and related availability and informational materials, please visit: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning
A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov

HOW TO COMMENT | Comments Due by March 20, 2020

Email: DeltaConveyanceScoping@water.ca.gov

Mail: Delta Conveyance Scoping Comments
Attn: Renee Rodriguez, Department of Water Resources
P.O. Box 942836 Sacramento, CA 94236

At a Public Meeting
(See dates and locations for all public scoping meetings on reverse side.)

DEPARTMENT OF WATER RESOURCES • STATE OF CALIFORNIA •

Attend a Public Meeting

Several public scoping meetings will be held throughout the state as an opportunity to get information, ask questions and submit comments on the scope of the EIR.

FIRST-CLASS MAIL
POSTAGE & FEES PAID
DEPT. WATER RESOURCES
PERMIT NO. 2014

Sacramento | 2/3/20, 1:00 p.m. – 3:00 p.m. | CA EPA Building | 1001 I Street, Sacramento

Los Angeles | 2/5/20, 6:00 p.m. – 8:00 p.m. | Junipero Serra State Building | 320 West Fourth Street, Los Angeles

Walnut Grove | 2/10/20, 6:00 p.m. – 8:00 p.m. | Jean Harvie Community Center | 14273 River Road, Walnut Grove

San Jose | 2/12/20, 6:00 p.m. – 8:00 p.m. | Santa Clara Valley Water District Board Room | 5750 Almaden Expressway, San Jose

Stockton | 2/13/20, 6:00 p.m. – 8:00 p.m. | San Joaquin Council of Governments, Board Room | 555 Weber Avenue, Stockton

Clarksburg | 2/19/20, 6:00 p.m. – 8:00 p.m. | Clarksburg Middle School Auditorium | 52870 Netherlands Road, Clarksburg

Brentwood | 2/20/20, 6:00 p.m. – 8:00 p.m. | Brentwood Community Ctr, Conference Room | 35 Oak Street, Brentwood

For more information, contact:
Para más información por favor llame al
Để biết thêm thông tin, xin gọi số
Para sa karagdagang impormasyon, mangyaring tumawag sa
如欲瞭解更多資訊, 請致電
Kom tau lus qhia ntxiv, thov hu
សំរាប់ព័តិមានថែមទៀត សូមទូរស័ព្ទមកលេខ

1-866-924-9955

Appendix B.6
Fliers

Delta Conveyance Environmental Review Initiated and Public Scoping Meetings Scheduled

The Department of Water Resources has released a Notice of Preparation (NOP) for the development of an Environmental Impact Report (EIR) for a proposed single tunnel option to modernize Delta conveyance, initiating the environmental review process under the California Environmental Quality Act (CEQA).

The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review, including the potential environmental impacts of the proposed single tunnel conveyance project and range of alternatives that will be analyzed in the EIR.

To view the Notice of Preparation and related availability and informational materials, please visit: https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Environmental-Planning.
A hard copy of the NOP may be requested via email at: deltaconveyance@water.ca.gov.

HOW TO COMMENT

Comments Due by March 20, 2020



Email:
DeltaConveyanceScoping@water.ca.gov



Mail:
Delta Conveyance Scoping Comments
Attn: Renee Rodriguez,
Department of Water Resources
P.O. Box 942836 Sacramento, CA 94236



At a Public Meeting
Several public scoping meetings will be held throughout the state as an opportunity to get information, ask questions and submit comments on the scope of the EIR.

For more information, contact:
Para más información por favor llame al
Để biết thêm thông tin, xin gọi số
Para sa karagdagang impormasyon, mangyaring tumawag sa
如欲瞭解更多資訊, 請致電
Kom tau lus qhia ntxiv, thov hu
សំរាប់ព័ត៌មានថែមទៀត សូមទូរស័ព្ទមកលេខ

1-866-924-9955

PUBLIC SCOPING MEETINGS

Sacramento
Monday, February 3, 2020
1:00 p.m. – 3:00 p.m.
CA EPA Building
1001 I Street, Sacramento

Los Angeles
Wednesday, February 5, 2020
6:00 p.m. – 8:00 p.m.
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Wednesday, February 19, 2020
6:00 p.m. – 8:00 p.m.
Clarksburg Middle School Auditorium
52870 Netherlands Road, Clarksburg

Brentwood
Thursday, February 20, 2020
6:00 p.m. – 8:00 p.m.
Brentwood Community Ctr, Conference Room
35 Oak Street, Brentwood

Appendix C
Scoping Meeting Materials

Appendix C.1
Meeting Agenda

CALIFORNIA DEPARTMENT OF
WATER RESOURCES

Delta Conveyance Project CEQA Public Scoping Meeting
Agenda

**Doors open for check-in 30 minutes prior to the listed meeting start time so presentations can begin promptly.*

1. **Welcome/Meeting Format –** Janet Barbieri, *Facilitator (5 minutes)*
    - DWR is seeking agency and public input on the scope of issues to be addressed in the Environmental Impact Report (EIR) and input about alternatives that meet the project's objective

2. **Presentation -** Carrie Buckman*, Environmental Program Manager, Department of Water Resources (30 minutes)*
    - California Environmental Quality Act (CEQA) Overview
    - Notice of Preparation (NOP) Details
    - Scoping Process and Public Involvement
    - Opportunity to ask clarifying questions related to the scoping process or contents of the NOP

3. **Comment Session** *(1 hour 25 minutes)*
    - Commenters will have three minutes to provide verbal comment that will be entered into the record
    - Comments may also be submitted in several ways:
        - In writing at today's meeting
        - Email: DeltaConveyanceScoping@water.ca.gov
        - Mail: Department of Water Resources
          Attn: Renee Rodriguez
          P.O. Box 942836
          Sacramento, CA 94236
    - All comments received during the scoping period will be considered in the development of the Draft EIR

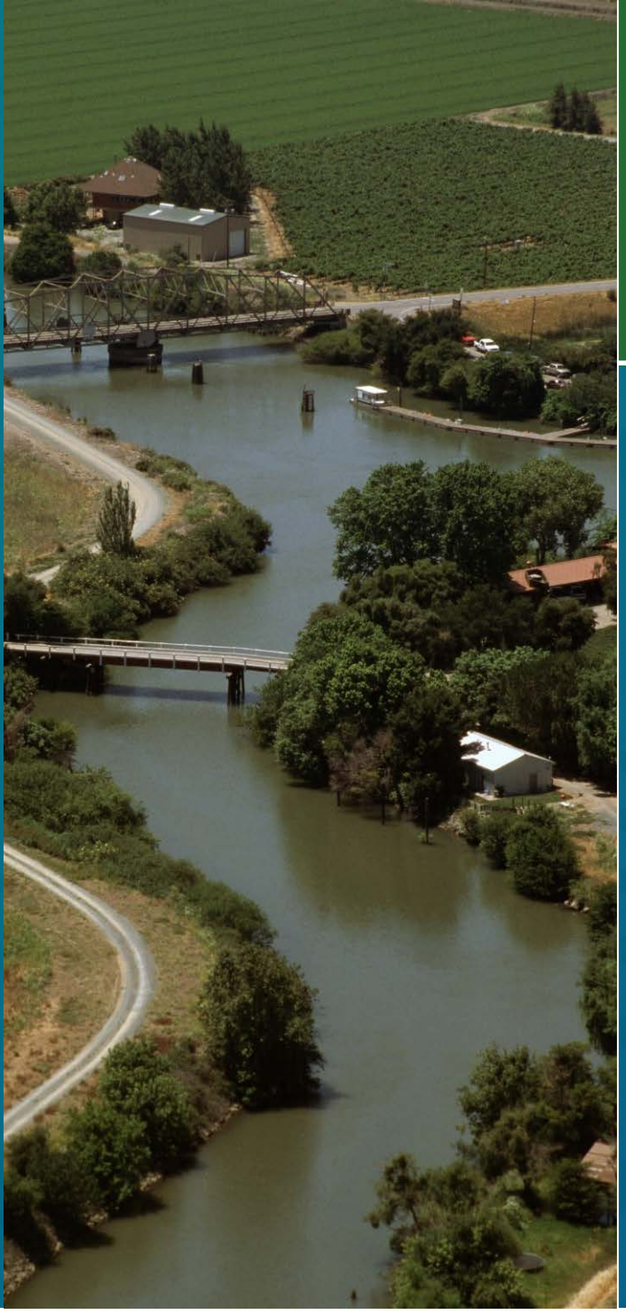
Appendix C.2
Meeting Presentation

February 2020

Delta Conveyance Project: *Scoping and CEQA*

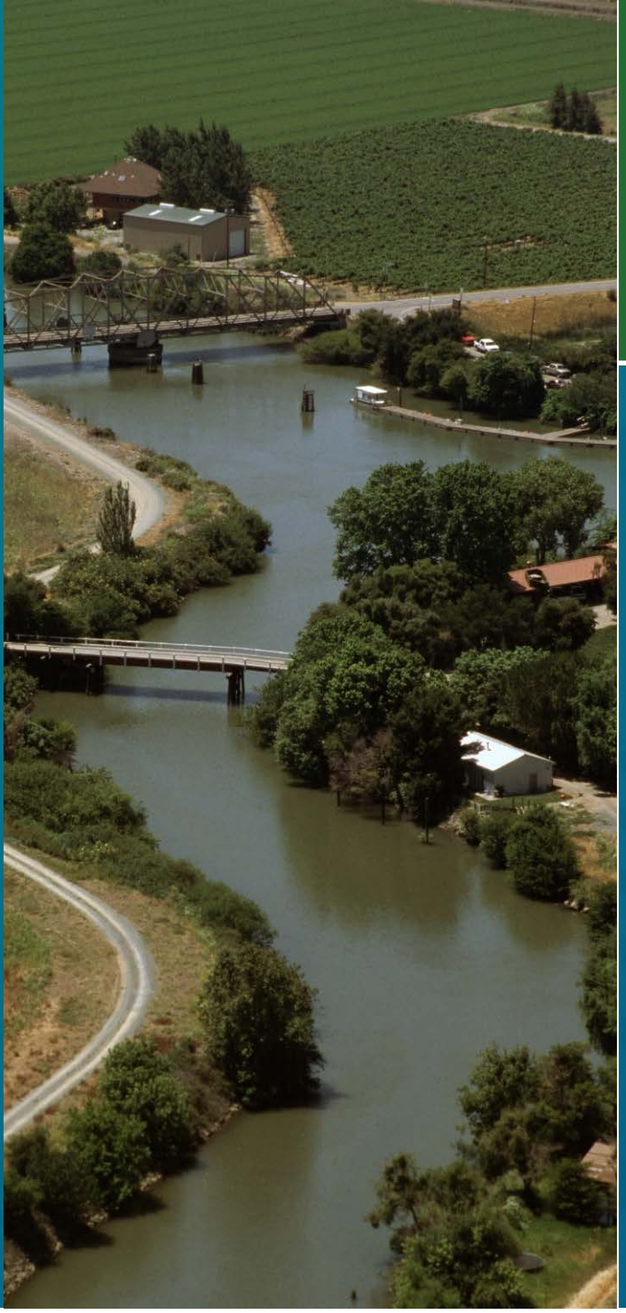
Carrie Buckman
Environmental Program Manager

CALIFORNIA DEPARTMENT OF WATER RESOURCES



Environmental Impact Report (EIR)

- **Inform**: Decision-makers and the public about a proposed project's environmental effects
- **Identify**: Ways to avoid or reduce significant environmental impacts
- **Prevent**: Environmental damage by requiring implementation of feasible alternatives or mitigation measures
- **Foster**: Interagency coordination and public participation
- **Show**: That the agency is considering environmental implications of actions prior to making decisions



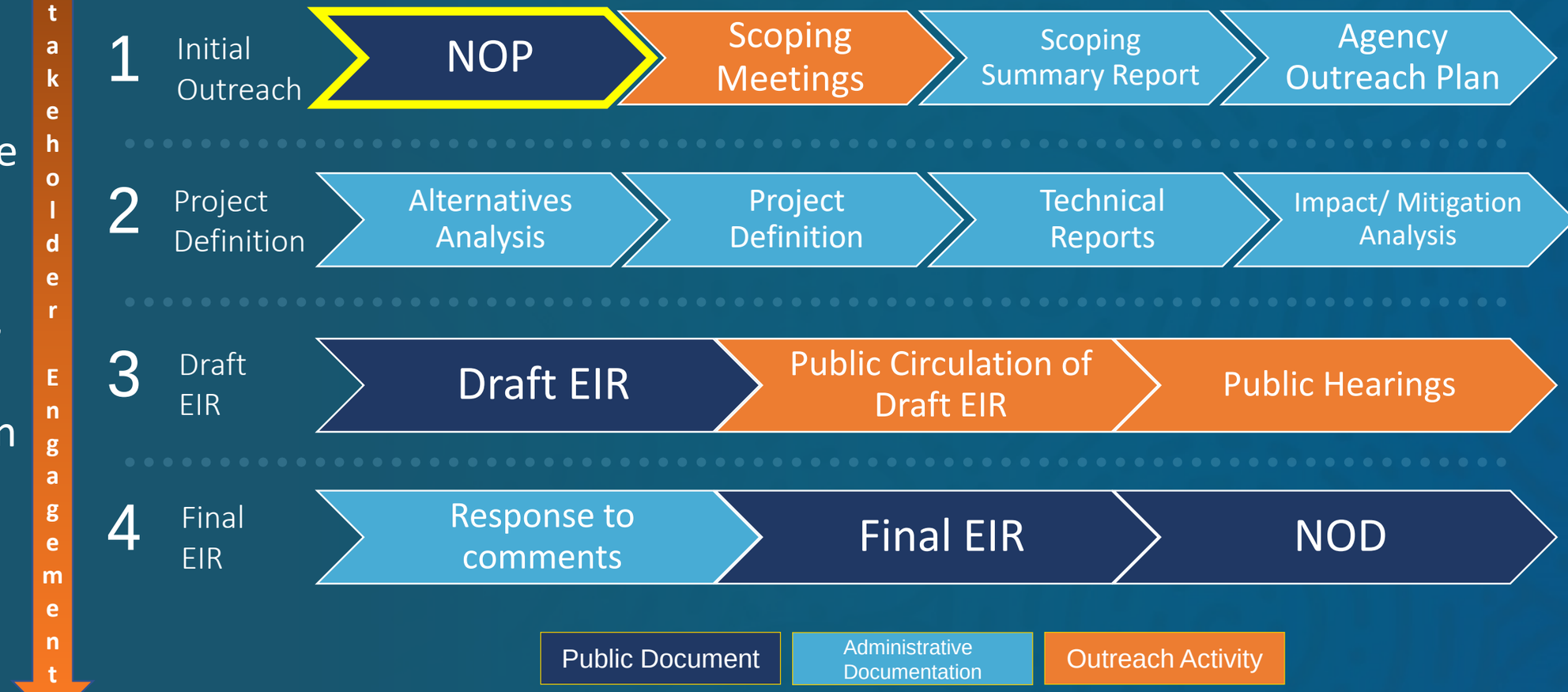
Key Contents of an EIR

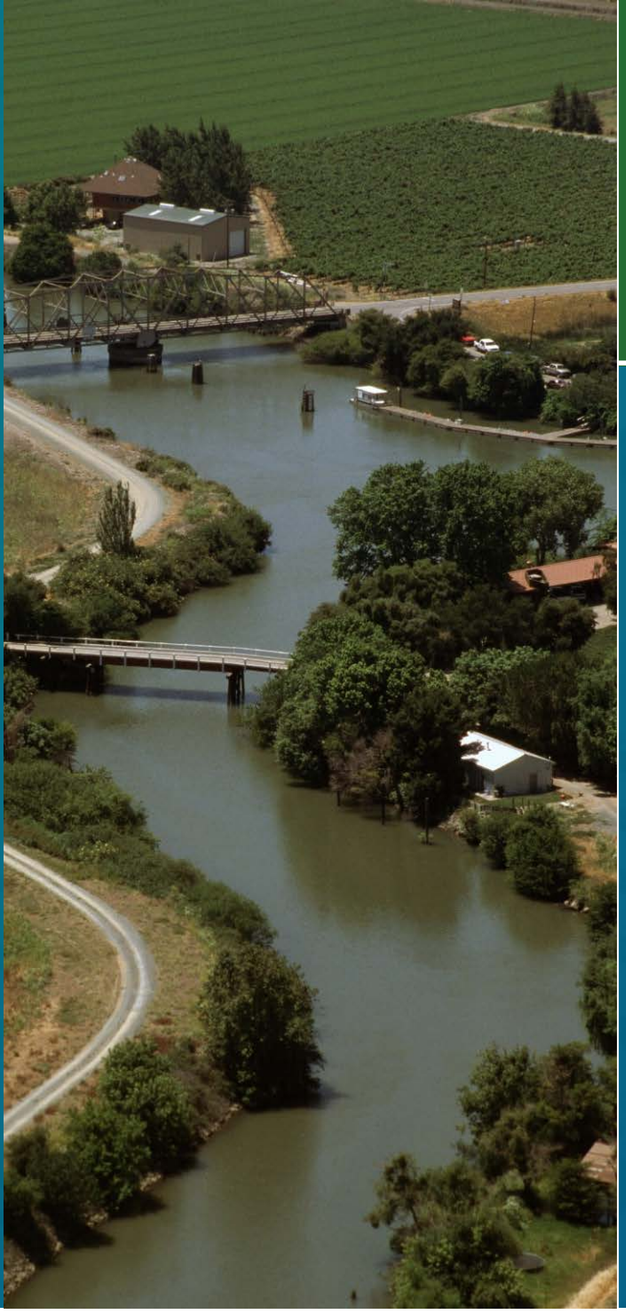
- Project description
- Environmental setting / baseline
- Discussion of significant environmental impacts
- Direct, indirect and cumulative impacts
- Mitigation measures
- Growth-inducing impacts
- Alternatives compared in meaningful detail
- Significant irreversible changes
- Organizations / persons consulted
- Summary

Delta Conveyance Environmental Review

Identify, analyze and disclose the potential significant adverse environmental impacts of a proposed project, and provide feasible mitigation measures and alternatives to avoid or reduce such effects.

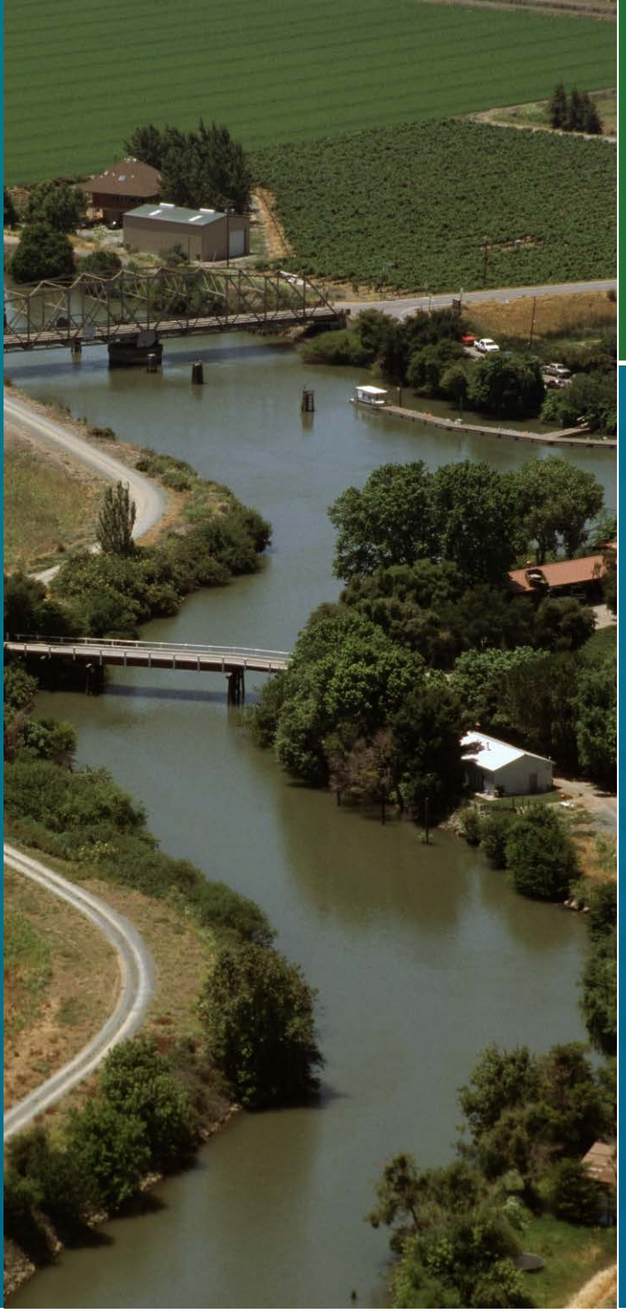
Stakeholder Engagement





Notice of Preparation (NOP) Background

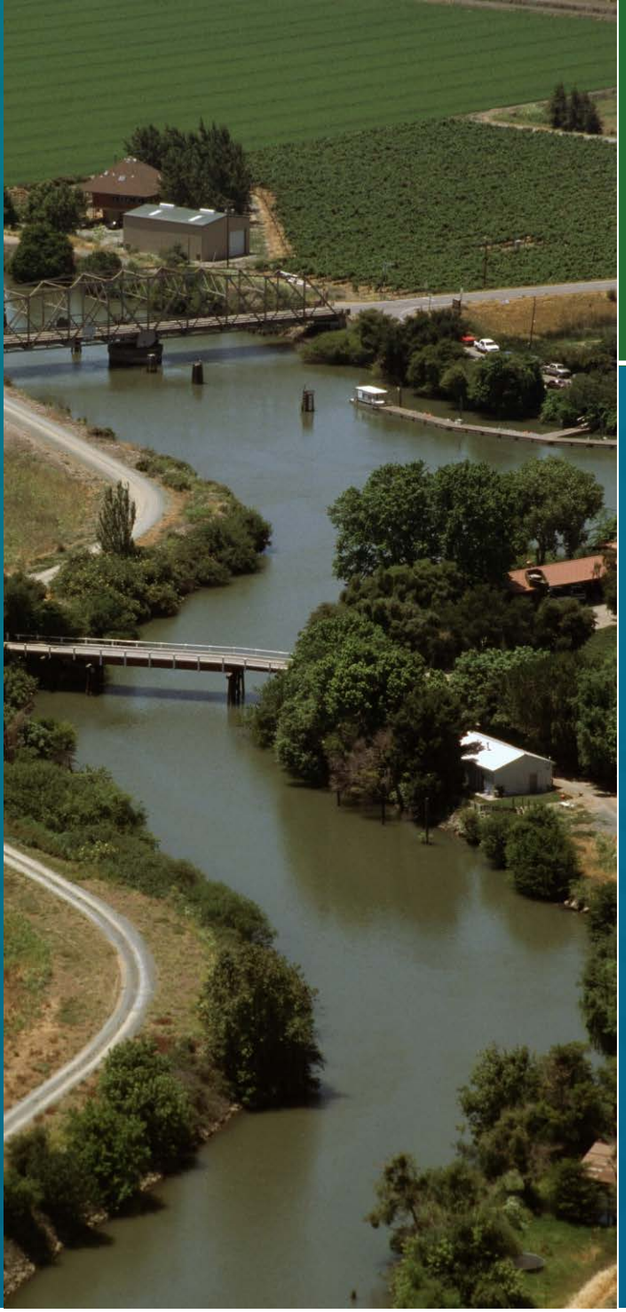
- **July 2017**: DWR approved a two-tunnel conveyance project (California WaterFix).
- **February 2019**: Governor Newsom announced his support for a single tunnel conveyance project.
- **April 2019**: Executive Order issued, directing DWR to assess planning for a single tunnel project.
- **May 2019**: DWR withdrew all California WaterFix approval and environmental compliance documentation.
- **January 2020**: State released draft Water Resilience Portfolio and DWR issued an NOP for a proposed single tunnel project.



Notice of Preparation Purpose

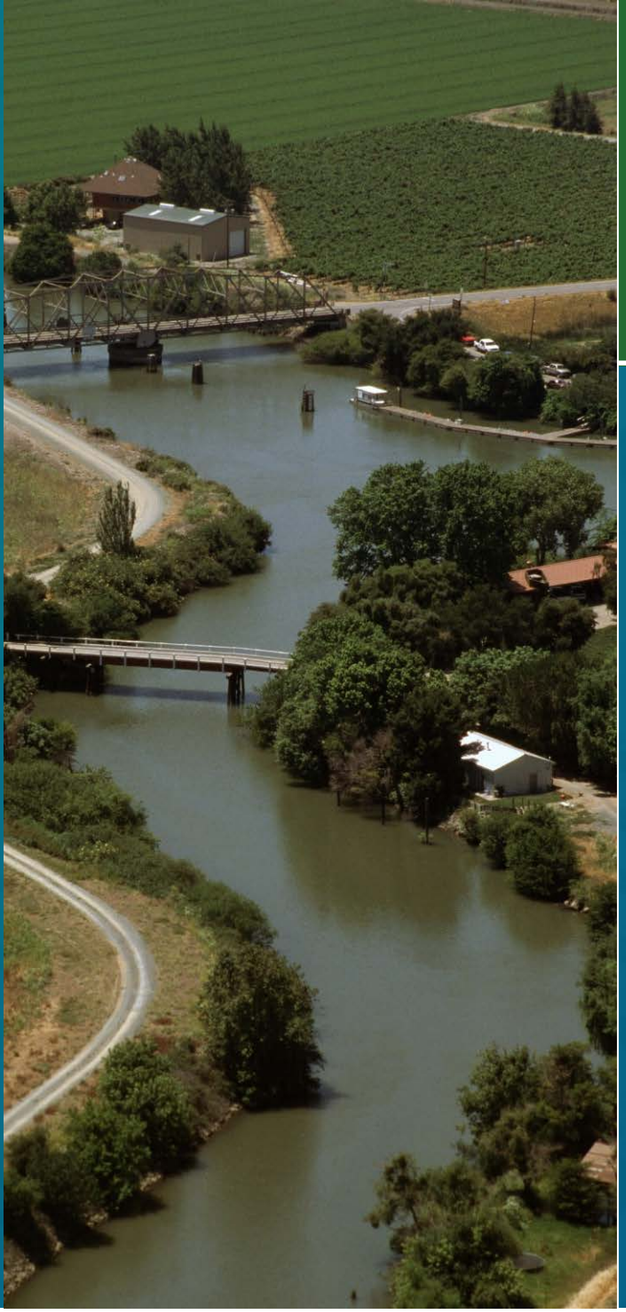
- Documents the intent to develop an EIR for the Delta Conveyance Project
- Triggers the start of scoping
- Describes the proposed project, including probable environmental effects
- Provides notice about scoping meetings and how to make a scoping comment

The NOP is not a decision document.



Scoping Purpose

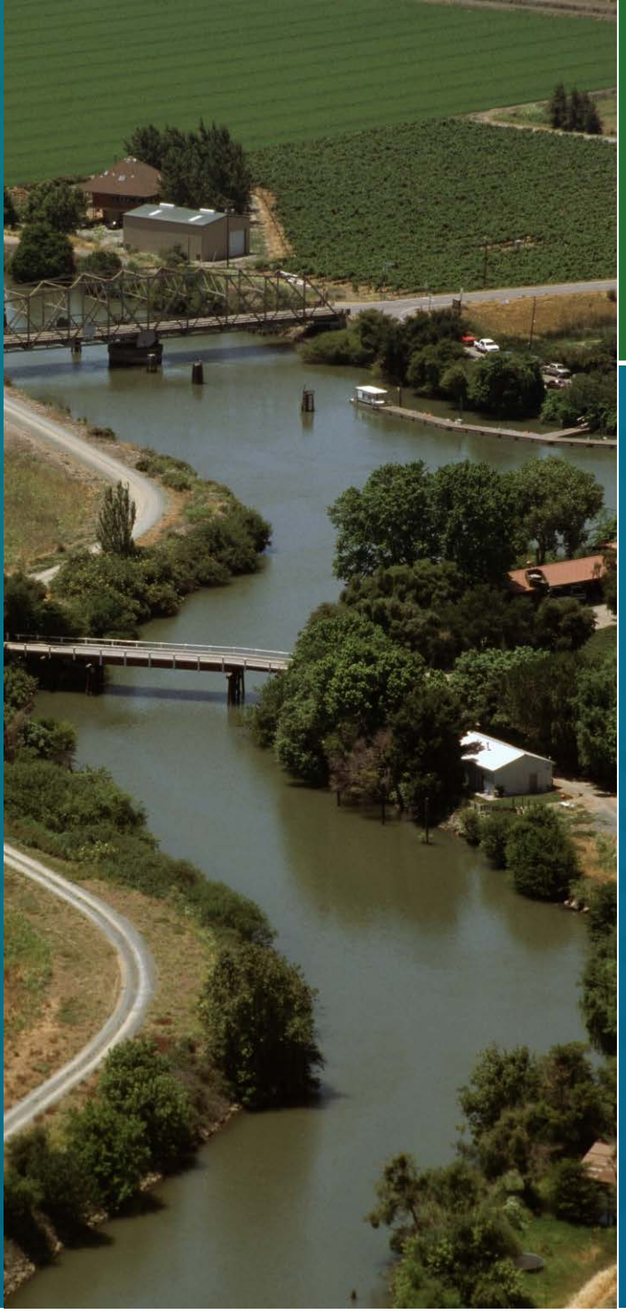
- Provides an opportunity for responsible/trustee agencies, other public agencies, tribes and the general public to comment on:
  - Locations, corridors, capacities and operations of new conveyance facilities to evaluate in the EIR
  - Alternatives to evaluate in the EIR
  - Impacts and mitigation to evaluate in the EIR
  - Other issues Lead Agency should consider for the EIR



Notice of Preparation Contents

The Delta Conveyance Project NOP includes:

- Description of Proposed Project
- Proposed Project Objectives
- Proposed Project Area
- Proposed Project Facilities



Delta Conveyance Project: Purpose and Objectives

Purpose: Develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of water deliveries in a cost-effective manner, consistent with the State's Water Resilience Portfolio.

Objectives:

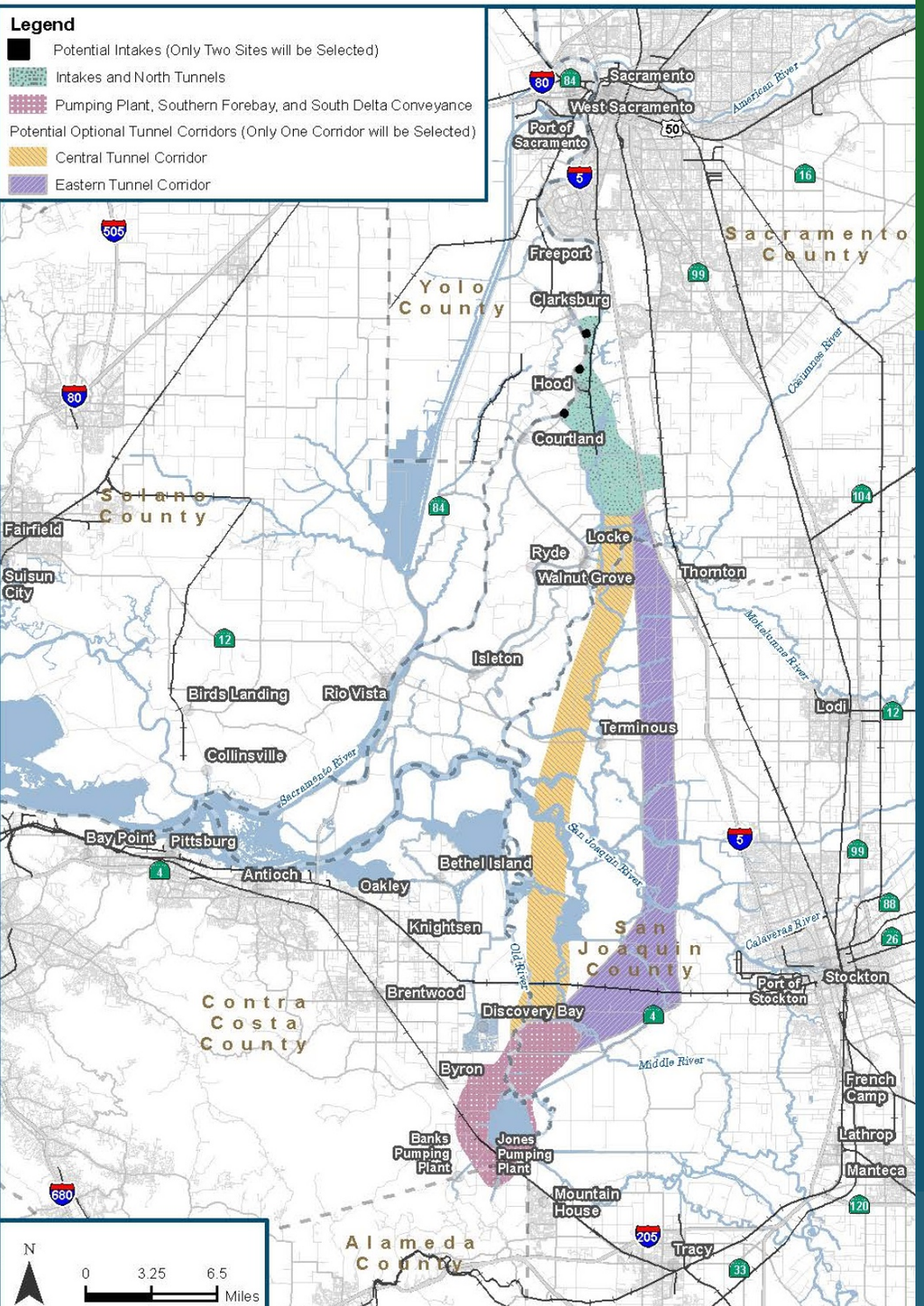
- **Address** sea level rise and climate change
- **Minimize** water supply disruption due to seismic risk
- **Protect** water supply reliability
- **Provide** operational flexibility to improve aquatic conditions

Proposed Project Area

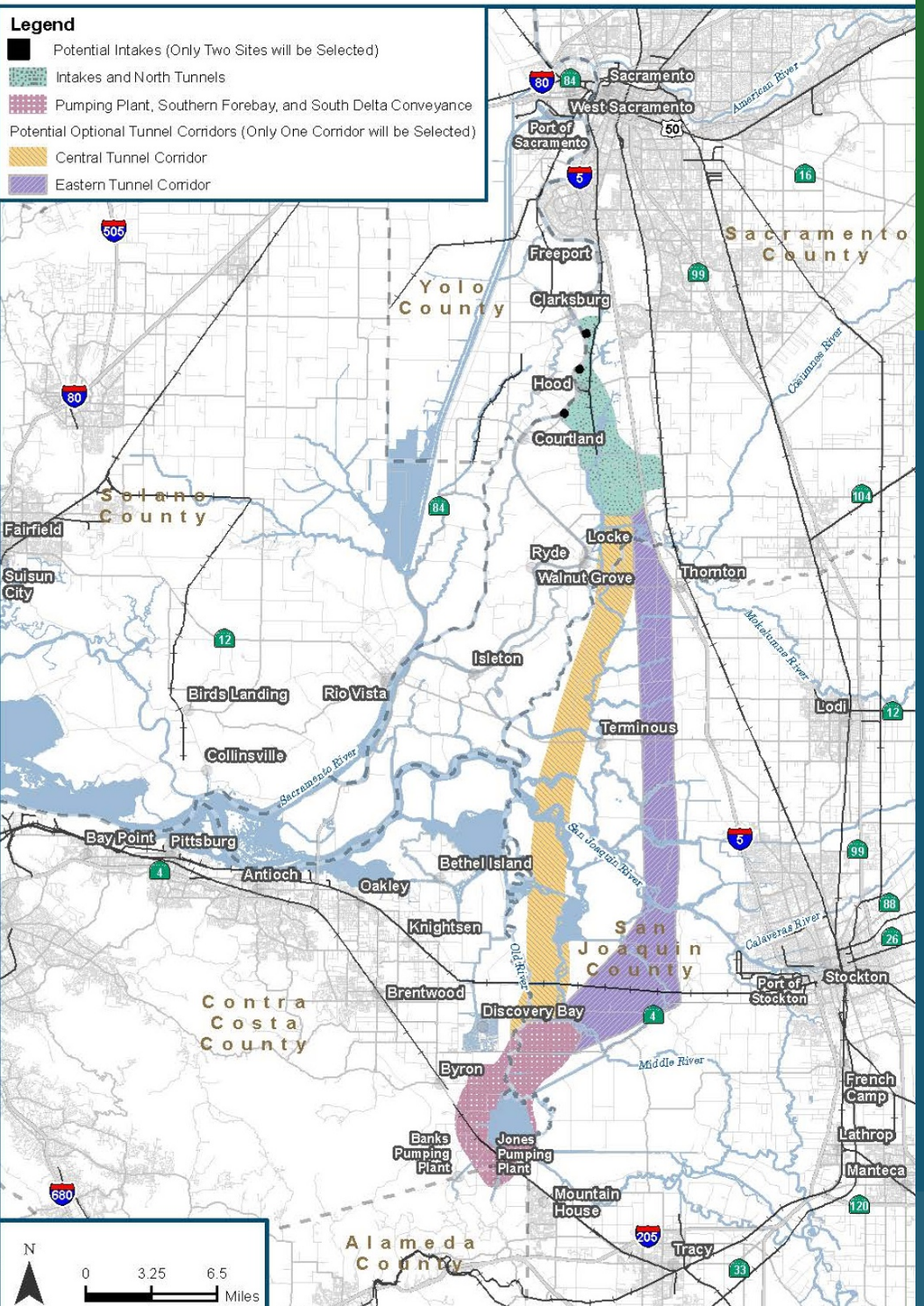


- Upstream of the Delta region
- Statutory Delta
- South-of-Delta

Proposed Project Facilities



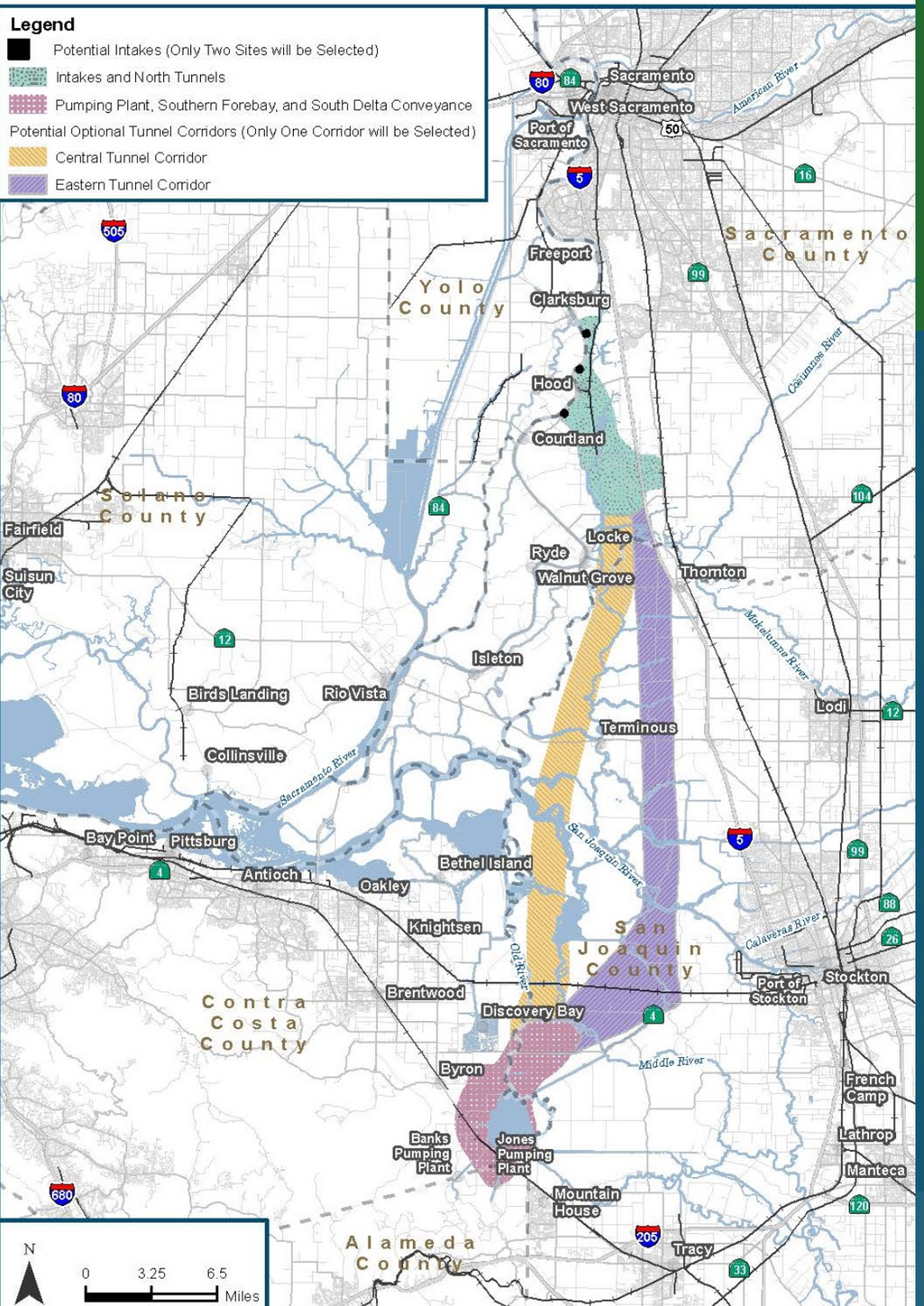
- Intake facilities on the Sacramento River
- Tunnel reaches and tunnel shafts
- Forebays
- Pumping plant
- South Delta conveyance facilities



Proposed Project Corridors

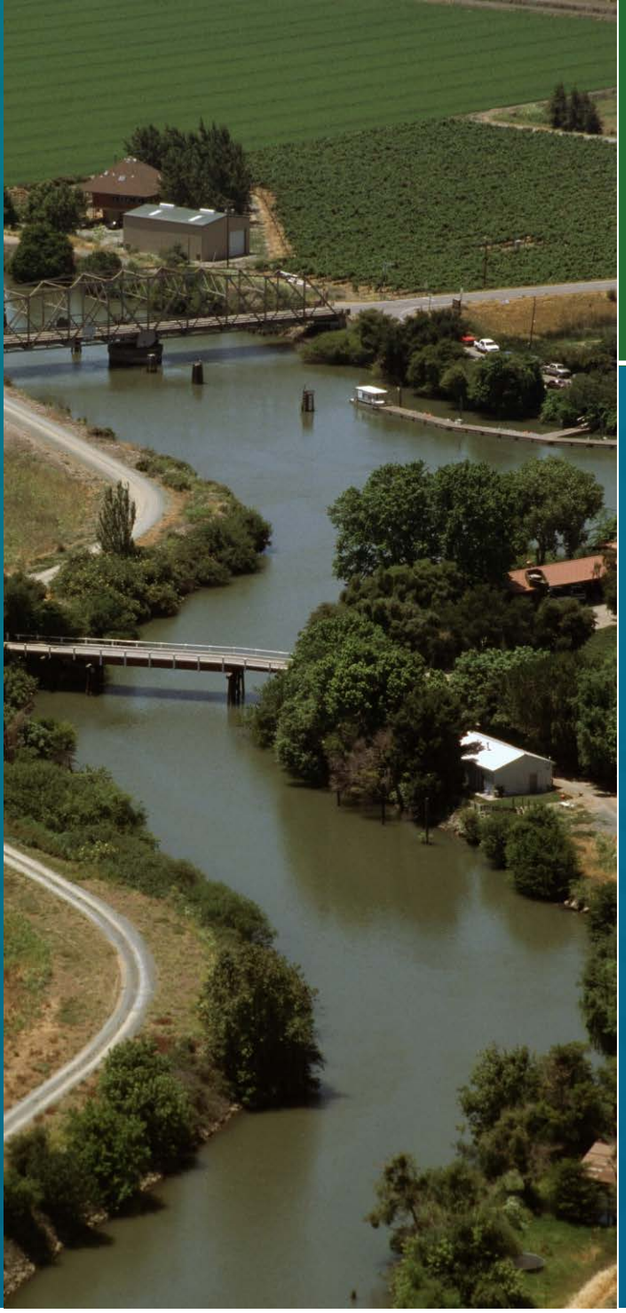
Options:

- A single tunnel is proposed to follow one of two corridors in the central or eastern portion of the Delta.



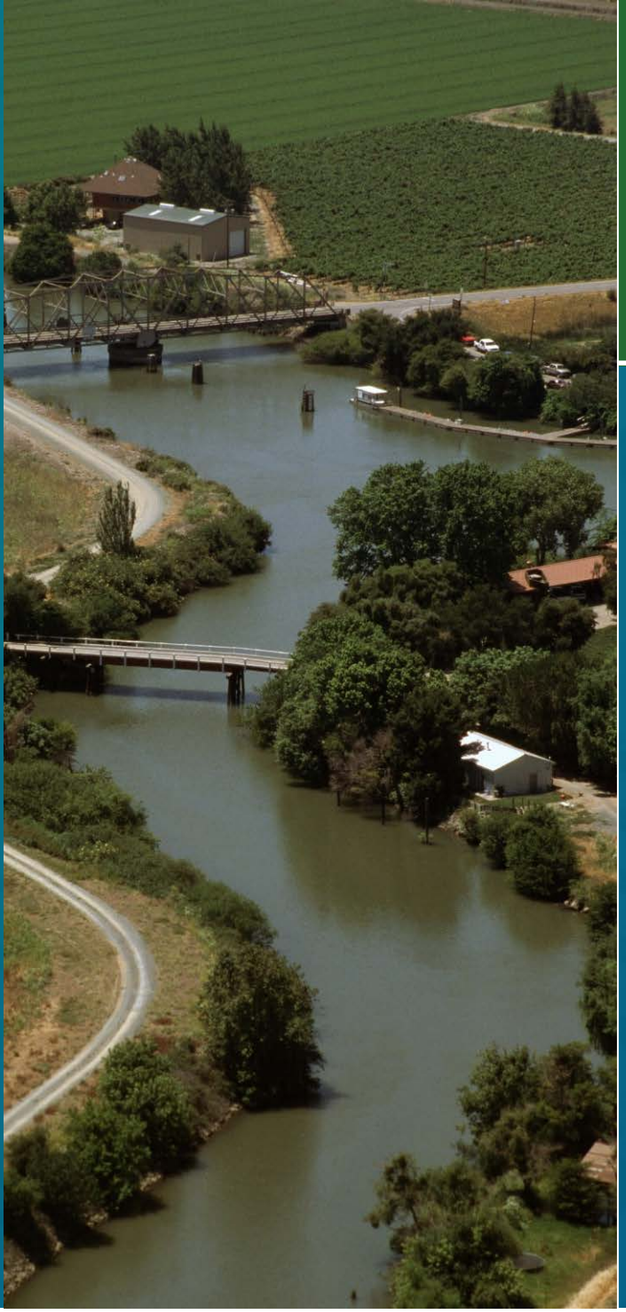
Proposed Project Capacity

- 6,000 cubic feet-per-second (cfs) combined between two intakes (3,000 cfs each).
- Likely alternatives to the proposed project capacity will likely be considered within the range of 3,000 cfs – 7,500 cfs.



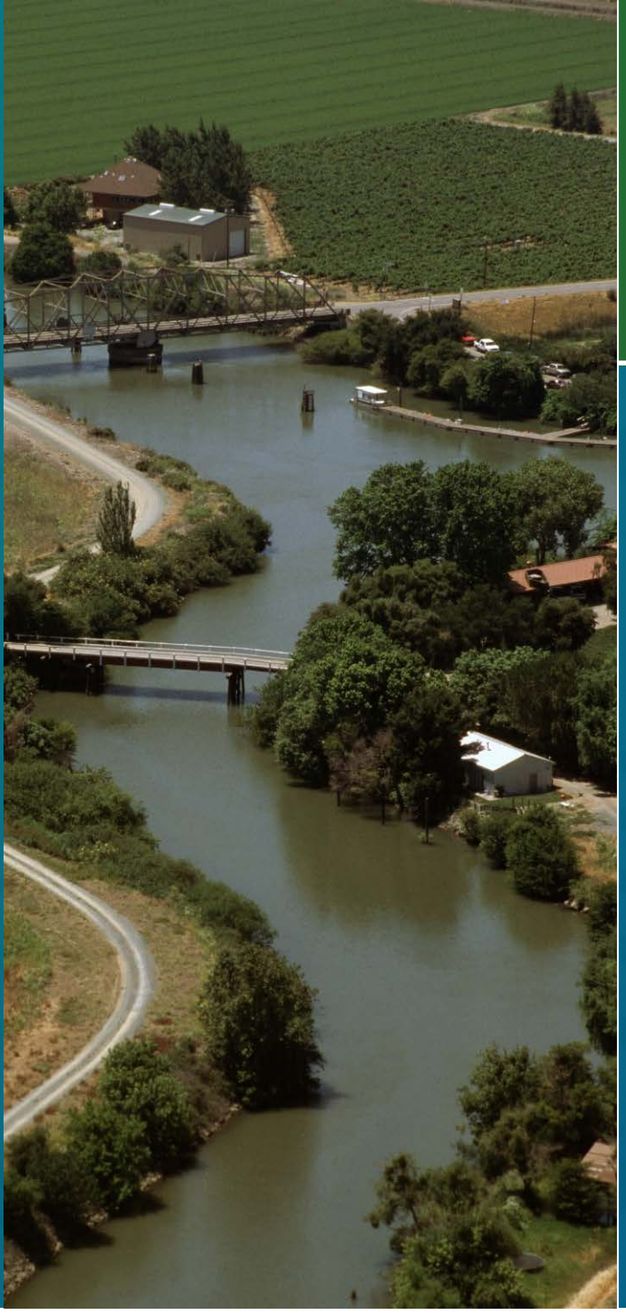
Operations

- A new diversion facility would be operated together with existing South Delta pumping facilities.
- Operations would increase DWR’s ability to capture water during high flow events.
- Initial operating criteria will be formulated to assess impacts and mitigation.
- Final project operations would be determined after California Environmental Quality Act (CEQA) and permitting is complete.



Alternatives Development

- DWR will select a reasonable range of potentially feasible alternatives that meet project objectives and present opportunities to reduce impacts.
- The scoping period provides an opportunity for the public to comment on alternatives.
- Following scoping, DWR will publicize the alternatives it intends to include for detailed evaluation in the Draft EIR.



How to Comment

Comments due by March 20, 2020

ELECTRONIC:

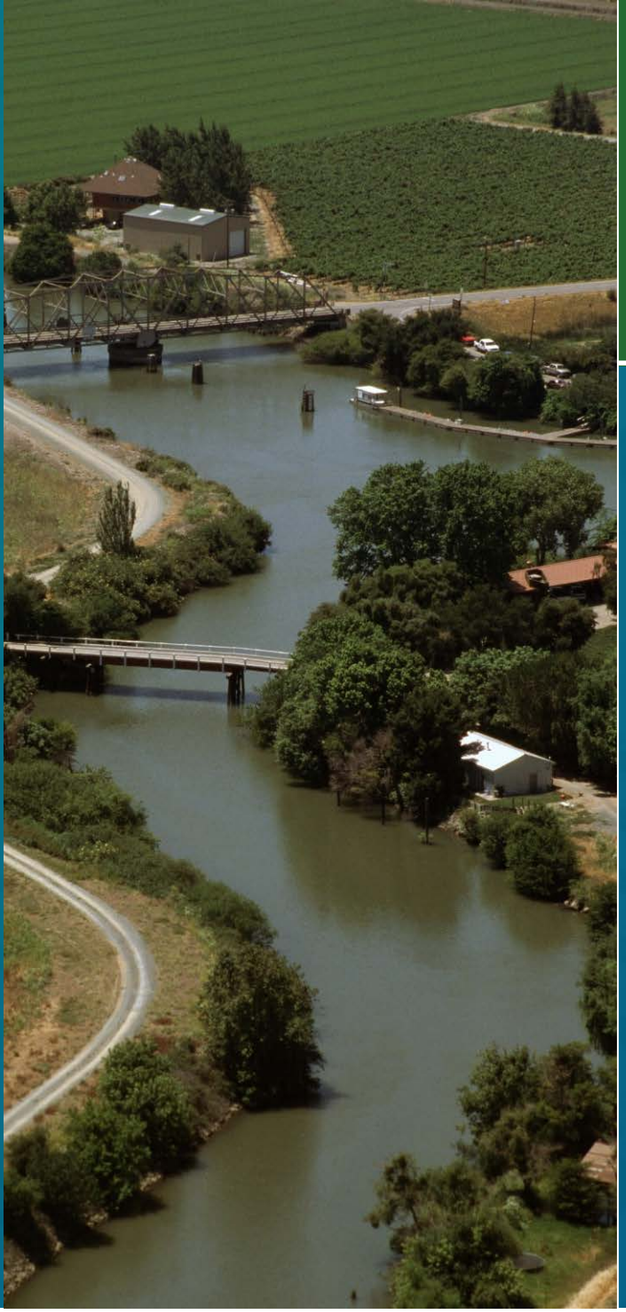
By email to: DeltaConveyanceScoping@water.ca.gov

MAIL:

Delta Conveyance Scoping Comments
Attn: Renee Rodriguez, Department of Water Resources
P.O. Box 942836
Sacramento CA 94236

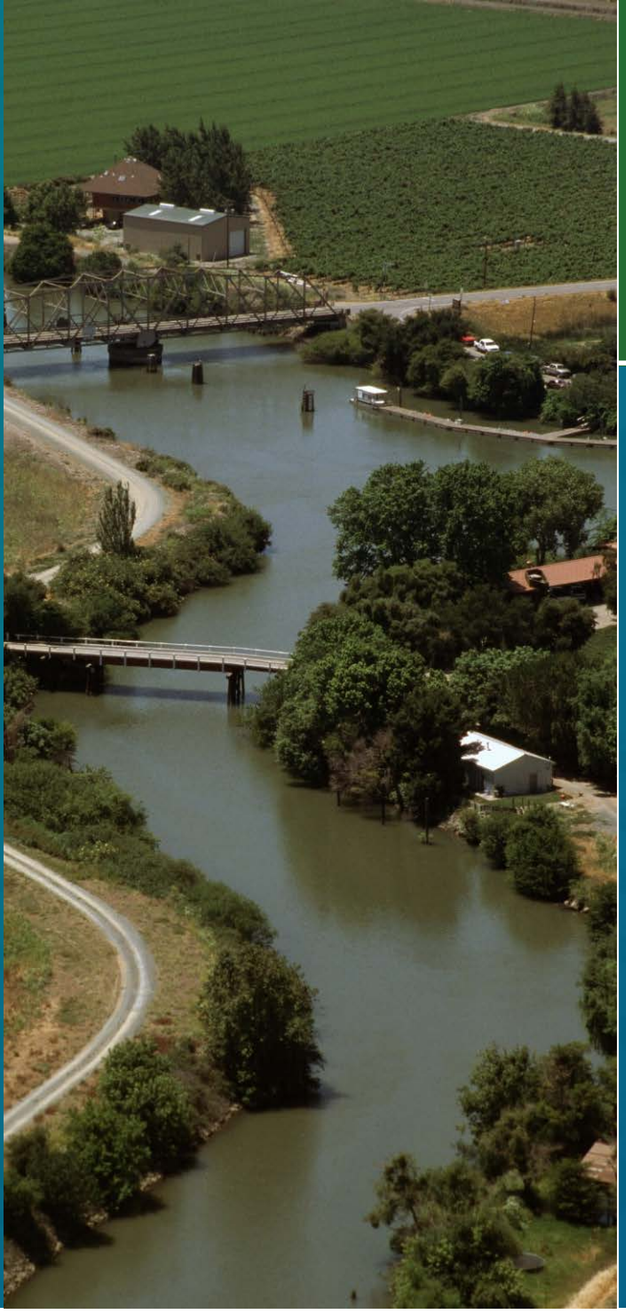
AT A PUBLIC MEETING:

Verbal comments will be recorded by a court reporter.
Written comments may also be submitted at the meeting.



How are Scoping Comments Used?

- Following the close of the scoping period, DWR will consider all input received and will issue a scoping report to document the process and common themes.
- The comments received during scoping will help inform DWR in developing alternatives and in conducting impact analyses.



List of Scoping Meetings

SACRAMENTO
Monday, February 3, 2020
1 p.m. – 3 p.m.

LOS ANGELES
Wednesday, February 5, 2020
6 p.m. – 8 p.m.

WALNUT GROVE
Monday, February 10, 2020
6 p.m. – 8 p.m.

SAN JOSE
Wednesday, February 12, 2020
6 p.m. – 8 p.m.

STOCKTON
Thursday, February 13, 2020
6 p.m. – 8 p.m.

CLARKSBURG
Wednesday, February 19, 2020
6 p.m. – 8 p.m.

BRENTWOOD
Thursday, February 20, 2020
6 p.m. – 8 p.m.

REDDING
Monday, March 2, 2020
6 p.m. – 8 p.m.

Ways to Stay Informed

Learn more on the DWR website and stay up to date with news and other information on social media.

water.ca.gov

- Programs
  - State Water Project
    - Delta Conveyance

Project Hotline

866.924.9955

Twitter

@CA_DWR

Project Email

DeltaConveyance@water.ca.gov

Appendix C.3
Fact Sheet

Delta Conveyance Environmental Review Notice of Preparation Overview

January 2020

The Department of Water Resources (DWR) is pursuing an environmental review process to evaluate a single tunnel option to modernize Delta conveyance under the California Environmental Quality Act (CEQA). The first step in this process is release of a Notice of Preparation (NOP). The NOP informs agencies and the public about the preparation of the Environmental Impact Report (EIR) and solicits input on the scope and content of the EIR, including information needs, potential project effects and mitigation measures, and possible alternatives to the proposed project.

Modernizing Delta conveyance is part of the state's Water Resilience Portfolio, which describes the framework to address California's water challenges and support long-term water resilience and ecosystem health.

CEQA FAST FACTS

- **Who is the CEQA Lead Agency?** California Department of Water Resources
- **What's in a NOP?** A Notice of Preparation includes a description of the Proposed Project, including Project Objectives, Project Area, and Project Facilities, probable environmental effects of the project, scoping meeting details and deadline for submittal of comments.
- **What is the Purpose of Environmental Review?** Prior to approval of a project, CEQA requires an agency to prepare an EIR that will identify, analyze and disclose the significant adverse environmental impacts of a proposed project, and provide feasible mitigation measures and alternatives to avoid or reduce such effects.
- **What Resource Areas will be Studied?** The EIR will evaluate topics including but not limited to:
  - water supply
  - groundwater
  - water quality
  - geology and seismicity
  - soils
  - fish and aquatic resources
  - terrestrial biological resources
  - land use
  - recreation
  - aesthetics
  - cultural resources
  - transportation
  - utilities
  - energy
  - air quality
  - noise
  - hazardous materials
  - public health
  - mineral resources
  - climate change and growth

PURPOSE AND OBJECTIVES

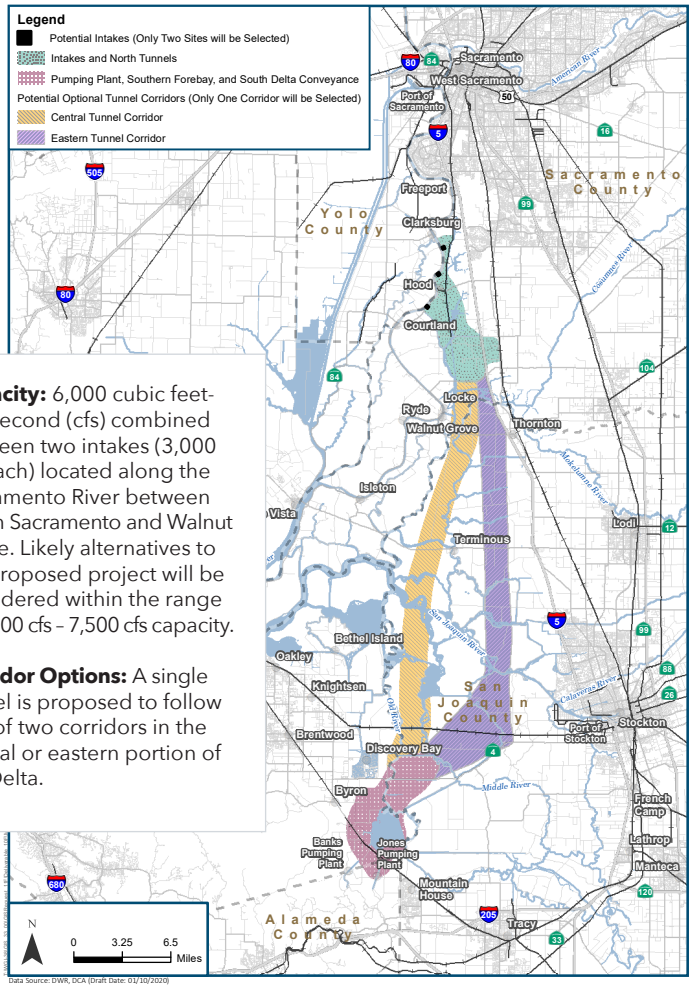
To assist in the development of a reasonable range of alternatives that will be analyzed in the EIR, DWR has identified the following purpose and objectives for the proposed Delta Conveyance Project.

Purpose: Develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of water deliveries in a cost-effective manner, consistent with the State's Water Resilience Portfolio.

Objectives:

- Address sea level rise and climate change
- Minimize water supply disruption due to seismic risk
- Protect water supply reliability
- Provide operational flexibility to improve aquatic conditions in the Delta

PROPOSED DELTA CONVEYANCE PROJECT FACILITIES

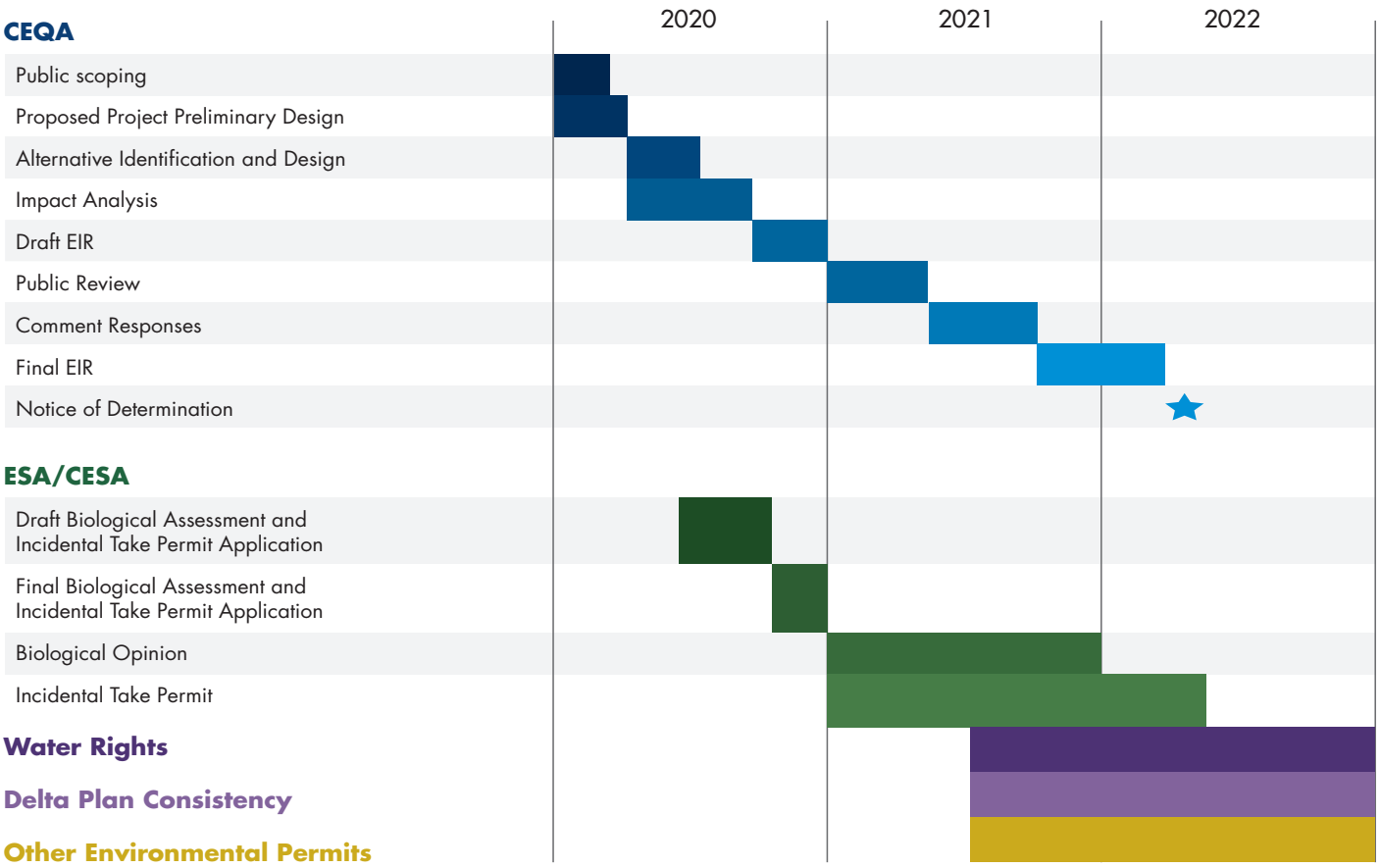


Capacity: 6,000 cubic feet-per-second (cfs) combined between two intakes (3,000 cfs each) located along the Sacramento River between South Sacramento and Walnut Grove. Likely alternatives to the proposed project will be considered within the range of 3,000 cfs – 7,500 cfs capacity.

Corridor Options: A single tunnel is proposed to follow one of two corridors in the central or eastern portion of the Delta.

DELTA CONVEYANCE ENVIRONMENTAL COMPLIANCE MILESTONES

This schedule details the actions associated with the environmental review process under CEQA and other required environmental compliance activities and is subject to change. There are several opportunities for public involvement throughout the process.



HOW TO COMMENT | Comments Due: March 20, 2020

Email: DeltaConveyanceScoping@water.ca.gov

Mail: Delta Conveyance Scoping Comments, Attn: Renee Rodriguez, Department of Water Resources, P.O. Box 942836 Sacramento, CA 94236

Attend a Public Meeting: Several public scoping meetings will be held throughout the state as an opportunity to get information and submit comments on the scope of the EIR.

Sacramento | 2/3/20, 1:00 p.m. – 3:00 p.m. | CA EPA Building | 1001 I Street, Sacramento

Los Angeles | 2/5/20, 6:00 p.m. – 8:00 p.m. | Junipero Serra State Building 320 West Fourth Street, Los Angeles

Walnut Grove | 2/10/20, 6:00 p.m. – 8:00 p.m. | Jean Harvie Community Center 14273 River Road, Walnut Grove

San Jose | 2/12/20, 6:00 p.m. – 8:00 p.m. | Santa Clara Valley Water District Board Room 5750 Almaden Expressway, San Jose

Stockton | 2/13/20, 6:00 p.m. – 8:00 p.m. | San Joaquin Council of Governments, Board Room | 555 Weber Avenue, Stockton

Clarksburg | 2/19/20, 6:00 p.m. – 8:00 p.m. | Clarksburg Middle School Auditorium 52870 Netherlands Road, Clarksburg

Brentwood | 2/20/20, 6:00 p.m. – 8:00 p.m. | Brentwood Community Ctr, Conference Room | 35 Oak Street, Brentwood

About Comments
All comments received during the scoping period will be considered in the development of the Draft EIR. DWR is seeking public input on the scope of issues to be addressed in the EIR and input about alternatives that meet the project's objectives.

For more information, contact:
Para más información por favor llame al
Để biết thêm thông tin, xin gọi số
Para sa karagdagang impormasyon, mangyaring tumawag sa
如欲瞭解更多資訊, 請致電
Kom tau lus qhia ntxiv, thov hu
សំរាប់ព័ត៌មានថែមទៀត សូមទូរស័ព្ទមកលេខ

1-866-924-9955

www.water.ca.gov/deltaconveyance

Appendix C.4

Q&A Sheet (English)

CALIFORNIA DEPARTMENT OF
WATER RESOURCES

Delta Conveyance Notice of Preparation and Public Scoping: Q&A

January 2020

1. **What is the purpose of the NOP?**
   The Notice of Preparation (NOP) is for the development of an Environmental Impact Report (EIR) for modernized water infrastructure in the Sacramento-San Joaquin Delta, initiating the environmental review process under the California Environmental Quality Act (CEQA). The NOP signals the start of the scoping period, providing an opportunity for public and agency comment on the scope and content of the CEQA review, including the potential environmental impacts of a proposed single tunnel conveyance project and range of alternatives that will be analyzed in the EIR.

2. **What is the importance of Delta Conveyance?**
   The Delta is a primary thoroughfare for water that is conveyed through the State Water Project. Rain and snow from the Sierra Nevada mountains flow through the Delta, where, consistent with water right and state water quality requirements, it is delivered by state and federal agencies to more than 27 million Californians and 3 million acres of farmland. The infrastructure that enables the conveyance, or movement, of California's water supply is critical to the health of local communities and the success of our state's economy.

3. **Why is this project needed?**
   The existing water system, with intakes in the southern Delta only three feet above today's mean sea level, is not prepared for a future with climate change and rising sea levels. Pumping restrictions that are a result of diverting supplies at this location continue to prevent the State Water Project from reliably capturing water when it is available, especially from storm events. New diversions in the northern Delta will promote a more resilient and flexible State Water Project in the face of unfavorable future conditions.

4. **How is the current environmental review process different than before?**
   In February 2019, at his State of the State address, Governor Newsom announced that he did not "support WaterFix as currently configured" but does "support a single tunnel." Since then, DWR formally withdrew all WaterFix approvals and environmental compliance documents and initiated a new environmental process to study a single-tunnel proposal under CEQA that continues with the issuance of this Notice of Preparation.

   As in previous iterations of Delta conveyance, requirements for environmental analysis, public review and comment will be adhered to as prescribed under CEQA and other permitting processes. The CEQA analysis of the Delta Conveyance Project will make use of previous documentation where it makes sense to do so, and will update data and information, or include new analysis, as appropriate.

5. **How does this new Delta Conveyance project differ from the previous California WaterFix project?**
   The primary difference is that the Delta Conveyance Project is proposed with a single main tunnel, rather than two main tunnels that were included in WaterFix. The proposed project includes two options for tunnel corridors; one is similar to the WaterFix proposed project and the second corridor is closer to Interstate 5. The Delta Conveyance Projects is also smaller in pumping capacity than WaterFix, proposed to be sized to accommodate a total 6,000 cubic feet per second (with two intake facilities) rather than 9,000 (with three intake facilities). (The EIR will likely consider a range of alternative capacities within 3,000 to 7,500 cfs.) The objective of the proposed project is however largely the same as WaterFix: to restore and protect the reliability of water supplies that move through the Delta by adding flexibility with a new point of diversion and new infrastructure.

6. **Who will identify the preferred alternative in this environmental review process and make the final decision on size and alignment, the participating water agencies or the state?**
   DWR is the owner and operator of the State Water Project, and proposed infrastructure upgrades are within the department's purview. DWR is the CEQA lead agency. It will be the State of California, through DWR, the California Natural Resources Agency, and the Governor's Office that will ultimately make final decisions on all aspects of the proposed Delta Conveyance Project.

7. **Will the WaterFix environmental analyses be considered in a new Delta conveyance environmental review process?**
   The 10+ years of scientific study and analyses that supported previous Delta conveyance planning efforts will be considered during this phase of planning and, where appropriate, utilized in the evaluation of the proposed Delta Conveyance Project. DWR will build upon the work already done by utilizing previous analyses, data and methodologies to the extent they are still applicable. However, DWR will update all relevant data and information and include new analysis, as appropriate.

8. **Will DWR use the same footprint, assumptions, baseline conditions, environmental setting, alignments, etc.?**
   Not necessarily. DWR will revisit all previous determinations to assess applicability. The scoping period is an opportunity to weigh in on these matters. Two possible alignment corridors for the proposed project have been identified in the NOP, as has a range for possible capacity alternatives.

9. **How many alternatives will be evaluated in the EIR?**
   DWR will select a reasonable range of potentially feasible alternatives that meet project objectives and present opportunities to reduce impacts, consistent with the requirements of CEQA. The scoping period provides an opportunity for the public to comment on alternatives. Following scoping, DWR will publicize the alternatives it intends to include for detailed evaluation in the Draft EIR.

10. Will the federal government have a role in this process?

In the NOP, DWR states that the Delta Conveyance Project will also involve federal agencies that must comply with the National Environmental Policy Act (NEPA), likely requiring the preparation of an Environmental Impact Statement (EIS). Federal Agencies with roles in the project may include approvals or permits issued by the United States Bureau of Reclamation (Reclamation) and United States Army Corps of Engineers. To assist in the anticipated federal agencies' NEPA compliance, DWR will prepare an EIR that includes relevant NEPA information where appropriate. Once established, the federal lead agency will publish a Notice of Intent to formally initiate the NEPA process. DWR will coordinate with the federal Lead Agency for NEPA compliance and, if appropriate, will prepare a joint EIR/EIS with the federal Lead Agency.

11. Which public water agencies are participating in the Delta Conveyance Project?

DWR is conducting preliminary contract negotiations with State Water Project contractors to determine a methodology for cost allocation for a Delta Conveyance Project. The Delta Conveyance Project EIR will assess, as part of the proposed project, potential environmental impacts associated with reasonably foreseeable potential contract modifications that were discussed during the preliminary contract negotiations.

12. Are water agencies looking for more water?

The implementation of the proposed Delta Conveyance Project will not involve any new water rights. The goal of modernizing Delta conveyance is to more reliably capture water during and after storm events, and to protect existing supplies from the threats posed by climate change, sea level rise and earthquakes. Separately, public water agencies throughout California are pursuing local supply resiliency projects such as recycling, groundwater recharge, storage and conservation to reduce reliance on the Delta to meet future needs. The Delta Conveyance Project is intended to help protect existing supplies consistent with existing water right amounts.

13. Is the state committed to meaningful public engagement and input?

Absolutely. DWR will be hosting a number of public engagement venues to gain the input of the public on issues related to the Delta Conveyance Project. The primary immediate opportunity will be the public scoping process, as announced in the NOP, that focuses on the scope of the environmental review, including alternatives to the proposed project. DWR will also provide background information on its website and is available to brief groups locally and statewide about the proposed project. In addition, DWR is planning a series of technical workshops during development of the EIR and public meetings after the release of the Draft EIR. Also, Wade Crowfoot, Secretary of the California Natural Resources Agency, has formed the Secretary's Delta Water Roundtable to provide a forum for direct conversation with Delta leaders on conveyance as well as major issues facing the Delta including but not limited to levees, flood protection, water quality, farmland preservation and aquatic invasive species. For the Delta Conveyance Project specifically, in addition to CEQA, there will be opportunities for public input for other permits or environmental review

processes, including those with the State Water Resources Control Board and the Delta Stewardship Council.

14. How was the proposed project capacity chosen?

The NOP defines a proposed project capacity that ensures protection of the state's most vulnerable and importance source of water. It also takes into account: 1) cost effectiveness of the project to the public water agencies funding the project, and 2) permitting needs. There will likely be alternatives considered with a range of capacities within the range of 3,000 cfs to 7,500 cfs. This could allow evaluation of options that may include participation by Central Valley Project (CVP) water agencies.

15. What is the schedule for environmental review?

The environmental review and permitting process is planned to be a three-year endeavor.

16. Will you include a non-structural alternative (e.g. "through-Delta")?

The EIR will look at a reasonable range of potentially feasible alternatives that can achieve the project objectives and avoid or reduce potential significant environmental impacts. The NOP identifies that the EIR will likely include alternatives with varying capacities. The NOP includes two options for tunnel conveyance corridors and there will also be a "no project" alternative included in the evaluation. DWR will identify the alternatives to be evaluated at a detailed level in the EIR following consideration of public input received during the scoping process.

17. Where will your intakes be located?

Based on the proposed project capacity of 6,000 cfs, two intakes have been identified in the NOP at locations based on analysis conducted previously (between Freeport and the confluence with Sutter Slough). DWR believes these locations to meet both the objectives of the project and goal of minimizing fishery-related impacts.

18. What will the project cost be?

There will be a cost estimate, as well as both a Benefit-Cost Analysis and a Financial Analysis, developed during the planning process. At this point, the NOP is a start of the environmental review, which focuses on the relative environmental impacts rather than economic issues. Cost analyses will come later in the process, after a preferred alternative has been selected (which may or may not be similar to the "proposed" project defined in the NOP).

19. Will there be new biological opinions related to the Delta Conveyance Project?

Consistent with Section 7 of the federal ESA, a biological assessment will be developed for the proposed Delta Conveyance Project to determine the adverse effects the project may have on federally listed species and critical habitat. We expect to coordinate with a lead federal action agency to initiate formal consultation and receive biological opinions from both National Marine Fisheries Service and US Fish and Wildlife Service. It is expected that the Section 7

process will yield new biological opinions on the Delta Conveyance Project issued by USFWS and NMFS. In addition, a new incidental take permit from the California Department of Fish and Wildlife will be sought by DWR consistent with the requirements of CESA.

20. **How can the public get engaged in Delta flow and water quality impacts? When will there be an operations plan made available?**
    The State Water Resources Control Board is currently working on updating Water Quality Control Plan standards. DWR will comply with the results of those efforts. Final operational plans specifically for the proposed Delta Conveyance Project will not be determined until after the other permitting processes are complete (including CEQA, CESA, and the Change in Point of Diversion before the State Board). However, preliminary operational assumptions will be included for analysis in the EIR to assist in the assessment of water quality, aquatic resources, hydrodynamic effects on non-project water users, etc.

21. **Will this project change water rights? Will it take more water out of the system?**
    As stated above, DWR is not seeking new water rights, simply a change in the point of diversion for its existing water right. By adding a new point of diversion, the system will have greater flexibility to adapt to climate change, manage rising sea levels, function in the event of a natural disaster, and safely move water during high flow events that are currently out of reach.

Appendix C.5

Q&A Sheet (Spanish)

CALIFORNIA DEPARTMENT OF
WATER RESOURCES

Preguntas y respuestas sobre el Aviso de Preparación y Comentario Público del Proyecto de Transporte de Agua por Túnel Único en el Delta, conocido en inglés como, *Delta Conveyance Notice of Preparation and Public Scoping*
Enero de 2020

1. **¿Cuál es el propósito del NOP?**
   El aviso de preparación (*notice of preparation*, NOP) es para el desarrollo de un reporte sobre el impacto ambiental (*environmental impact report*, EIR) para la modernización de la infraestructura hídrica en el Sacramento-San Joaquín Delta, con lo que se da inicio al estudio de los efectos ambientales, de conformidad con la Ley de Calidad Ambiental de California (*California Environmental Quality Act*, CEQA). El NOP señala el comienzo del período de comentario público, lo que brinda al público y a cualquier organismo público la oportunidad para hacer sus comentarios sobre la trayectoria y el contenido del estudio de la CEQA, incluidos los posibles impactos ambientales de una propuesta de proyecto de transporte de túnel único y una gama de alternativas que se analizarán en el EIR.

2. **¿Cuál es la importancia del transporte de agua por túnel unico en el delta?**
   El delta es la vía principal para el agua que es transportada a través del proyecto estatal del agua (*State Water Project*). La lluvia y la nieve de la Sierra Nevada fluyen a través del delta, donde, en concordancia con el derecho al agua y los requisitos estatales de calidad del agua, se entrega por agencias estatales y federales a más de 27 millones de californianos y 3 millones de acres de tierras agrícolas. La infraestructura que permite el transporte o movimiento de agua de California es fundamental para la salud de las comunidades locales y para el éxito de la economía de nuestro estado.

3. **¿Por qué se necesita este proyecto?**
   El sistema de agua existente, con puntos de bombeo en el sur del delta a solo tres pies por encima del nivel medio del mar de hoy, no está preparado para un futuro con el cambio climático y el aumento del nivel del mar. Las restricciones de bombeo que son el resultado de desvió de agua en este lugar continúan impidiendo que el proyecto estatal de agua (SWP) tome de manera confiable el agua cuando está disponible, especialmente en casos de tormentas. Nuevas desviaciones en el norte del delta promoverán un proyecto estatal de agua más resistente y flexible frente a futuras condiciones desfavorables.

4. **¿En que difiere el proceso actual de estudio de efectos ambientales del anterior?**
   En febrero de 2019, en su Memoria y Cuenta del Estado, el gobernador Newsom anunció que no apoya "WaterFix como está configurado actualmente", pero sí apoya "un solo túnel". Desde entonces, el Departamento de Recursos Hídricos (Department of Water Resources, DWR) retiró formalmente todas las aprobaciones de WaterFix y documentos de cumplimiento ambiental e inició un nuevo proceso ambiental para estudiar una propuesta de túnel único dentro del marco de la CEQA, que continúa con la emisión de este aviso de preparación.

   Al igual que en las iteraciones anteriores del transporte en el delta, se acatarán los requisitos para el análisis ambiental, el examen y los comentarios del público, según lo prescrito en la CEQA y otros procesos de permisos. El análisis de la CEQA del proyecto de transporte de agua por túnel único en el delta utilizará la documentación previa

cuando tenga sentido hacerlo, y actualizará los datos y la información, o incluirá un nuevo análisis, según corresponda.

5. **¿En qué se diferencia este nuevo proyecto de transporte de agua por túnel único en el delta del anterior proyecto California WaterFix?**
   La principal diferencia es que el proyecto de transporte de agua en el delta se plantea un solo túnel principal, en lugar de dos túneles principales que se incluyeron en WaterFix. La propuesta incluye dos opciones para corredores de túnel: uno es similar al del proyecto propuesto por WaterFix y el segundo corredor está más cerca de la Interestatal 5. El proyecto de transporte de agua por túnel único en el delta también es más pequeño que WaterFix en capacidad de bombeo, propuesto para ser dimensionado con el fin de acomodar un total de 6,000 pies cúbicos por segundo (con dos instalaciones de captación) en lugar de 9,000 (con tres instalaciones de captación). (El EIR probablemente considerará un rango de capacidades alternativas dentro de 3,000 a 7,500 cfs.) Sin embargo, el objetivo del proyecto propuesto es en gran medida el mismo que WaterFix: restaurar y proteger la confiabilidad de los suministros de agua que se mueven a través del delta al agregar flexibilidad con un nuevo punto de desvío y nueva infraestructura.

6. **¿Quién identificará la alternativa preferida en este proceso de estudio de efectos ambientales y tomará la decisión final sobre el tamaño y la alineación: las agencias de agua participantes o el estado?**
   El DWR es el propietario y operador del proyecto estatal de agua, y las mejoras propuestas de infraestructura están dentro de la esfera de acción del Departamento. El DWR es la agencia líder de la CEQA. Será el estado de California, a través del DWR, la Agencia de Recursos Naturales de California y la Gobernación, los que tomen las decisiones en última instancia sobre todos los aspectos de la propuesta de proyecto de transporte en el delta.

7. **¿Se considerarán los análisis ambientales de WaterFix en un nuevo proceso de estudio de efectos ambientales con respecto al transporte en el delta?**
   Los más de 10 años de estudios y análisis científicos que respaldaron los esfuerzos previos de planificación de transporte en el delta se considerarán durante esta fase de planificación y, cuando corresponda, se utilizarán en la evaluación de la propuesta de proyecto de transporte en el delta. El DWR se basará en el trabajo ya realizado al utilizar los análisis, datos y metodologías anteriores en la medida en que aún sean aplicables. Sin embargo, el DWR actualizará todos los datos e información relevantes e incluirá un nuevo análisis, según corresponda.

8. **¿El DWR usará la misma huella, supuestos, condiciones de referencia, entorno ambiental, alineaciones, etc.?**
   No necesariamente. El DWR revisará todas las determinaciones anteriores para evaluar la capacidad. El período de la evaluación del alcance es una oportunidad para sopesar estos asuntos. Se han identificado dos posibles corredores de alineación para la propuesta de proyecto en el NOP, al igual que un rango para posibles alternativas de capacidad.

9. **¿Cuántas alternativas se evaluarán en el EIR?**
   El DWR seleccionará una gama razonable de alternativas potencialmente factibles que cumplan con los objetivos del proyecto y presenten oportunidades para reducir los impactos, en concordancia con los requisitos de la CEQA. El período de la evaluación del alcance ofrece una oportunidad para que el público comente sobre las

alternativas. Acto seguido, el DWR publicará las alternativas que pretende incluir para una evaluación detallada en el borrador del EIR.

10. ¿Tendrá el gobierno federal un papel en este proceso?

En el NOP, el DWR afirma que el proyecto de transporte en el delta también involucrará a agencias federales que deben cumplir con la Ley Nacional de Política Ambiental (National Environmental Policy Act, NEPA), lo que probablemente requiera la preparación de una declaración de impacto ambiental (environmental impact statement, EIS). Los organismos federales con funciones en el proyecto pueden incluir aprobaciones o permisos emitidos por la Oficina de Reclamación (Reclamación) de los Estados Unidos y el Cuerpo de Ingenieros del Ejército de los Estados Unidos. Para asistir en el cumplimiento anticipado de la NEPA por parte de los organismos federales, el DWR preparará un EIR que incluya información relevante de la NEPA, cuando corresponda. Una vez establecida, el organismo federal principal publicará un aviso de intención para iniciar formalmente el proceso de la NEPA. El DWR se coordinará con el organismo federal principal para el cumplimiento de la NEPA y, si corresponde, preparará un EIR/EIS junto con el organismo federal principal.

11. ¿Qué agencias públicas de agua participan en el proyecto de transporte en el delta?

El DWR lleva a cabo negociaciones preliminares de contrato con los contratistas del proyecto estatal de agua con el fin de determinar una metodología para la asignación de costos en un proyecto de transporte en el delta. El EIR correspondiente al proyecto de transporte en el delta evaluará, como parte del proyecto propuesto, los posibles impactos ambientales asociados a posibles modificaciones del contrato razonablemente previsibles, que se discutieron durante las negociaciones preliminares del contrato.

12. ¿Las agencias de agua están buscando más agua?

La implementación de la propuesta de proyecto de transporte en el delta no implicará ningún nuevo derecho de agua. El objetivo de modernizar el transporte en el delta es captar el agua de manera más confiable durante y después de las tormentas, y proteger los suministros existentes de las amenazas que plantea el cambio climático, el aumento del nivel del mar y los terremotos. Por separado, los organismos públicos de agua en todo California llevan a cabo proyectos locales de resiliencia del suministro, como reciclaje, recarga de agua subterránea, almacenamiento y conservación, con el fin de reducir la dependencia del delta para satisfacer las necesidades futuras. El proyecto de transporte en el delta tiene la intención de ayudar a proteger los suministros existentes en consonancia con las cantidades correctas de agua.

13. ¿Está el estado comprometido con una participación y contribución pública significativa?

Absolutamente. El DWR organizará una serie de lugares de participación pública para obtener la opinión del público sobre cuestiones relacionadas con el proyecto de transporte en el delta. La principal oportunidad inmediata será el proceso de evaluación del alcance por parte del público, como se anunció en el NOP, que se centra en el alcance del estudio de efectos ambientales, incluidas las alternativas al proyecto propuesto. El DWR también proporcionará información de antecedentes en su sitio web, y está disponible para informar a grupos locales y estatales sobre la propuesta de proyecto. Además, el DWR está planeando una serie de talleres técnicos durante el desarrollo del EIR y reuniones públicas después del lanzamiento del borrador del EIR. También, Wade Crowfoot, Secretario de la Agencia de Recursos Naturales de California, organizó la mesa redonda para el agua del delta con el fin de proporcionar un foro de

conversación directa con los líderes del delta sobre el transporte, así como los principales problemas que enfrenta el delta, incluidos, entre otros, diques, protección contra inundaciones, calidad del agua, preservación de tierras de cultivo y especies acuáticas invasoras. Para el proyecto de transporte en el delta específicamente, además de la CEQA, habrá oportunidades para la opinión pública en lo que respecta a otros permisos o procesos de estudio de efectos ambientales, incluidos aquellos con la Junta Estatal de Control de Recursos Hídricos y el Consejo Administrativo del Delta.

14. ¿Cómo se eligió la capacidad del proyecto propuesto?

El NOP define una capacidad del proyecto propuesto que garantiza la protección de la fuente hídrica más vulnerable e importante del estado. También tiene en cuenta: 1) la rentabilidad del proyecto para los organismos públicos de agua que financian el proyecto, y 2) las necesidades de permisos. Probablemente se considerarán alternativas con una gama de capacidades dentro del rango de 3,000 cfs a 7,500 cfs. Esto permitiría evaluar opciones que pueden incluir la participación de las agencias de agua del Proyecto del Valle Central (Central Valley Project, CVP).

15. ¿Cuál es el cronograma para la revisión ambiental?

El estudio de efectos ambientales y el proceso de permisos están planeados para ser un esfuerzo de tres años.

16. ¿Incluirá una alternativa no estructural (por ejemplo, "a través del delta")?

El EIR analizará una gama razonable de alternativas potencialmente factibles que pueden lograr los objetivos del proyecto y evitar o reducir los posibles impactos ambientales significativos. El NOP identifica que el EIR probablemente incluirá alternativas con diferentes capacidades. El NOP incluye dos opciones para corredores de transporte de túnel y también se incluirá una alternativa de "no proyecto" en la evaluación. El DWR identificará las alternativas que se evaluarán en detalle en el EIR luego de considerar la opinión pública recibida durante el proceso de evaluación del alcance.

17. ¿Dónde se ubicarán sus puntos de captación?

Con base en la capacidad en la propuesta del proyecto de 6,000 cfs, se han identificado dos puntos de captación en el NOP en ubicaciones basadas en el análisis realizado previamente (entre Freeport y la confluencia con Sutter Slough). El DWR cree que estos lugares cumplen con los objetivos del proyecto y la meta de minimizar los impactos relacionados con la pesca.

18. ¿Cuál será el costo del proyecto?

Habrá una estimación de costos, así como un análisis de costo-beneficio y un análisis financiero, desarrollado durante el proceso de planificación. En este punto, el NOP es el comienzo del estudio de efectos ambientales, que se centra en los impactos ambientales relativos en lugar de los problemas económicos. Los análisis de costos vendrán más adelante, después de que se haya seleccionado una alternativa preferida (que puede o no ser similar a la "propuesta" de proyecto que se define en el NOP).

19. ¿Habrá nuevas opiniones biológicas relacionadas con el proyecto de transporte en el delta?

De conformidad con la Sección 7 de la Ley Federal de Especies en Peligro de Extinción (Endangered Species Act, ESA), se realizará una evaluación biológica dentro del marco de la propuesta de proyecto de transporte en el delta para determinar los efectos adversos que el proyecto pudiera tener en las especies incluidas en la lista federal y el

hábitat crítico. Esperamos coordinar con una agencia de acción federal líder para iniciar consultas formales y recibir opiniones biológicas tanto del Servicio Nacional de Pesca Marina (National Marine Fisheries Service, NMFS) como del Servicio de Pesca y Fauna Silvestre de EE. UU. (US Fish and Wildlife Service, USFWS). Se espera que el proceso de la Sección 7 arroje nuevas opiniones biológicas sobre el proyecto de transporte en el delta emitidas por el USFWS y el NMFS. Además, el DWR buscará un nuevo permiso de captura incidental del Departamento de Pesca y Fauna Silvestre de California, de conformidad con los requisitos de la CESA.

20. **¿Cómo puede el público involucrarse en el flujo del delta y los impactos en la calidad del agua? ¿Cuándo habrá un plan de operaciones disponible?**
    La Junta Estatal de Control de Recursos Hídricos está trabajando actualmente en actualizar las normas del plan de control de calidad del agua. El DWR cumplirá con los resultados de esos esfuerzos. Los planes operativos finales, específicos para la propuesta de proyecto de transporte en el delta, no se determinarán sino hasta después de que finalicen los demás trámites de permisos (incluidos la CEQA, la CESA y el cambio en el punto de desvío ante la Junta Estatal). Sin embargo, se incluirán suposiciones operativas preliminares para su análisis en el EIR con miras a la evaluación de la calidad del agua, los recursos acuáticos, los efectos hidrodinámicos en los usuarios de agua que no pertenecen al proyecto, etc.

21. **¿Este proyecto cambiará los derechos de agua? ¿Tomará más agua del sistema?**
    Como se indicó anteriormente, el DWR no busca nuevos derechos de agua, simplemente un cambio en el punto de desvío de su derecho de agua existente. Al agregar un nuevo punto de desvío, el sistema tendrá mayor flexibilidad para adaptarse al cambio climático, controlar el aumento del nivel del mar, funcionar en caso de un desastre natural y mover el agua de manera segura durante eventos de alto flujo que actualmente están fuera del alcance.

Appendix C.6

Speaker Card

Delta Conveyance Project Scoping Meeting
Comment Request

Please fill out this request card if you would like to give a verbal comment. Comments are limited to 3 minutes.

Name _____

Organization _____

☐ I have a comment about the scope of the environmental review for the Delta Conveyance Project

Please submit this card at the sign-in table, at the front of the room, or give to a project representative.

Delta Conveyance Project Scoping Meeting
Comment Request

Please fill out this request card if you would like to give a verbal comment. Comments are limited to 3 minutes.

Name _____

Organization _____

☐ I have a comment about the scope of the environmental review for the Delta Conveyance Project

Please submit this card at the sign-in table, at the front of the room, or give to a project representative.

Appendix C.7
Comment Card

Delta Conveyance Project
Scoping Comment Card

The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name _____ Date _____

Organization _____ Email _____

Address _____

City _____ State _____ Zip _____

Email comments to DeltaConveyanceScoping@water.ca.gov.

FOLD ALONG DOTTED LINE

Delta Conveyance Project Scoping Comments
Attn: Renee Rodriguez
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

PLACE
STAMP
HERE

Delta Conveyance Project Scoping Comments
Attn: Renee Rodriguez
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

TAPE HERE

Appendix D
Scoping Comments Summary

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Table D-1. Comments Regarding the Scoping Process and the CEQA/NEPA Process

Letter Number	Commenter Name, Affiliation	Comment Text
52	Margo Robbins	Voicemail request to hold a meeting in northern California near Redding, Hoopa or Eureka area.
61	Janice Gloe	Please do not make decisions that cause long term destruction for short term profit!
79	Will Harling Mid Klamath Watershed Council	As someone who has worked and fought alongside first Nations to restore the Klamath and Trinity Rivers in California, I am deeply insulted that your scoping meetings do not facilitate feedback from the people most impacted by this deeply flawed plan. The closest meeting to the North state is Sacramento on Feb. 3rd, a seven hour drive from where I live on the Salmon River. I respectfully request you host a meeting to gather public input on this plan in Redding or Yreka, CA.
87	Jaclyn Shaw	How do we hear results of the local scoping meetings? Do you have research from M. Jeffries, Business data institute, at University of Pacific Stockton; or San Joaquin (County) Farm Bureau? LET'S SAVE THE RIVERS and FOOD CROPS, for the county agricultural economy to USA and the world, not temporary jobs for more soil salinity. Drought makes more drought. Any tunnel is counterproductive and ignorant, if not asinine
87	Jaclyn Shaw	Please hold a meeting at a Lodi winery or the county administration building. We practice regional responsibility. I do not believe most locals have seen the planned map!!! Thanks. Comments are to be submitted by March 20. What more will we learn to share with you by then? Please allow an added comment, if we have hearsay. Thanks for Scoping…
184	Gary Graham Hughes	Comment expresses concerns for the northern portion of California, specifically the Trinity area related to water supply and ecological needs. Comment also requests additional scoping meeting in the north state area.
269	Jeff Durbin	Make sure there is plenty of transparency and room for an independent whistle blower hotline.
370	Dr. Jeff Michael University of the Pacific, Eberhardt School of Business	The FAQs for this NOI says that economic and cost considerations will be considered after the project is selected. That's inconsistent with the best practices. It's inconsistent with your own guidelines.
484	Raven Stevens We Advocate through Environmental Review (WATER)	Thank you for bringing the meeting up north. You must continue to hold meetings up here so the public can participate. And it might make it easier for some if you actually went up to Yreka so they didn't have to drive an extra hour and a half.
485	Atta Stevenson California Indian Water Commission	The California Indian Water Commission hereby supports the Hoopa youth who valiantly campaigned for a public scoping forum that will allow Northern California residents traditional practitioner, fishing people, families and businesses to publicly voice our concerns.

538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	Another problem is that rushed last minute project changes can occur when financial problems finally emerge that do not receive adequate scrutiny. We certainly saw both of these problems with the twin-tunnel WaterFix. Another serious problem with this backwards approach is that it makes it easy for a project proponent to make claims and promises to operate in an environmentally friendly way in a report, just to get environmental approval and permits to build it. Feasibility analysis can tell you whether those promises are likely to be kept, or whether the operation of a facility like the tunnel is likely to be changed later in response to financial needs as well as economic and political pressure. Like a politician who makes promises they won't keep while they are trying to get elected, DWR appears to be making environmental promises they can't keep to get their permit to build.

539	Michael Brodsky Save the California Delta Alliance	The major premises of the project are to mitigate sea level rise due to climate change and to mitigate the risk of levee failure due to earthquake risk. The rationale is that by moving the point of diversion upstream, the incremental effects of salt water intrusion into the south and central Delta due to continuing sea level rise, and the potential for abrupt salt water intrusion due to levee failure, will be mitigated because the point of diversion will be far enough upstream to remain in fresh water--despite significant incursion of salt water into the Delta (whether over time due to climate change or suddenly due to catastrophic levee failure). This approach abandons the south, west, and central Delta to salt water intrusion and seeks to protect export water supplies by moving the point of diversion to the far north out of reach of salt water intrusion. However, it ignores the fact that a fundamental purpose of the SWP is to prevent saltwater intrusion into the Delta. "One of the major purposes of the projects was containment of maximum salinity intrusion into the Delta. By storing waters during periods of heavy flow and releasing water during times of low flow, the freshwater barrier could be maintained at a constant level." (United States v. State Water Resources Control Bd. (1986) 182 Cal.App.3d 82, 107.) With sea level rise as an omnipresent increased source of salt water intrusion, diverting Sacramento River inflow upstream of the south and central Delta, and reducing through-Delta freshwater flows, is antithetical to the purpose of the SWP. It is also antithetical to the dire need for more seaward flow in order to reverse the catastrophic decline of the Delta ecosystem now in progress. In the words of former United States Environmental Protection Agency Regional Administrator and current Secretary of the California Environmental Protection Agency, Jared Blumenfeld, "existing freshwater diversions and significantly diminished seaward flows have played a significant role in precluding the recovery of Bay Delta ecosystem processes and declining fish populations." (August 26, 2014, Letter from USEPA Administrator Jared Blumenfeld to National Marine Fisheries Service Administrator Will Stelle, p.2.) The only logical, and legally sound, approach to the problem is to increase the capacity for through-Delta freshwater flows in order to enhance the ability to push back anticipated increased saltwater intrusion and at the same time address the ongoing ecosystem crisis. Reducing water withdrawals for export is the optimal response to provide more water for critically needed in-stream seaward flow. "[T]he condition of the Delta's watery ecosystem, as measured especially by the population of wild salmon and other native fishes, has gone critical. The list of causes begins, but does not end, with all those water withdrawals, a kind of tax that leaves the system in a condition of chronic drought." (Delta Plan, p. ES-2.)
541	Deirdre Des Jardins California Water Research/Delta Defenders	There are also fundamental issues that, contrary to CEQA guidelines § 15063,the initial study information used for determination of intake sites and tunnel corridors in the Notice of Preparation has not been provided with the Notice of Preparation. The Notice of Preparation only refers to the previous WaterFix project, for which all project approvals were withdrawn on May 2, 2019(p. 9.)The Department of Water Resources has withdrawn all WaterFix project information from publication on the internet, so none of it is available for public inspection or reference in preparing scoping comments.

541	Deirdre Des Jardins California Water Research/Delta Defenders	It is clear that the decision to push forward with CEQA scoping during the pandemic is related to the schedule for engineering design work for the Delta Conveyance, under DWR's Joint Exercise of Powers Agreement with the Delta Conveyance Design and Construction Authority (DCA.) In January of 2019, the DCA signed a $93 million Engineering Design contract signed with Jacobs Engineering, and a $75 million contract signed in January 2019 with Fugro for Geotechnical services for the WaterFix project. In spite of withdrawal of all approvals for the WaterFix project, engineering design work has been proceeding under the WaterFix project engineering contracts since May of 2019. On June 12, 2019, North Delta Cares, Delta Defenders, and other Delta community-based groups sent a letter to DWR Director Karla Nemeth requesting that DWR withdraw DWR's authorization to commence work on the project. The Department of Water Resources stated in response: Neither the Department of Water Resources (DWR) nor the Delta Conveyance Design and Construction Authority (DCA) is continuing work on that project or currently performing any new planning based on the previous WaterFix approvals.
541	Deirdre Des Jardins California Water Research/Delta Defenders	But it has become clear that both DWR and the DCA are performing new planning based on the previous WaterFix project approvals. In December of 2019, the Delta Conveyance Design and Construction Authority met with a panel of international tunneling contractors to do an Independent Technical Review of the proposed Delta Conveyance Project. For the project specifications, the DCA gave the panel a copy of the July 2018 WaterFix Conceptual Engineering Report. Although the Independent Review Panel found that the main tunnel alignment for the WaterFix project was impractical and recommended that it not be studied further, that alignments in the Notice of Preparation as the Central Delta Corridor. Under supervision of the Department of Water Resources, the Delta Conveyance Design and Construction Authority has also been conducting a Delta stakeholder engagement process to consider the Delta Conveyance engineering design being developed by the DCA. In November 2019, the DCA appointed 16 Delta stakeholders to a Delta Stakeholder Engagement Committee. The members represented a broad range of Delta interests, from Delta businesses to sportfishing, recreation, environmental justice, and aquatic and terrestrial NGOs. Each committee member was tasked with receiving information on the proposed Delta tunnel project design and conveying the information to their respective stakeholders, and conveying feedback on the proposed design to the DCA.

541	Deirdre Des Jardins California Water Research/Delta Defenders	In presenting information to the DCA's Delta Stakeholder Engagement Committee on the choice of intake sites, the DCA's Engineering Manager Phil Ryan referred to the previous WaterFix project: DCA conducted a detailed site investigation. It is important to understand that DCA conducted its own detailed analysis and also utilized information compiled by the Fish Facility Technical Team (FFTT) for the previous WaterFix project. The FFTT was comprised of the fish regulatory agencies, consultants and other interested people who helped evaluate the river for potential intake sites. The FFTT identified, analyzed and then made conclusions on site locations. DCA reviewed their information to ensure understanding of their methodology, but then re-evaluated using new information such as the State's underwater river mapping conducted last summer. All of this information was used to re-evaluate and verify the potential intake sites....Based on evaluation of all of these factors, five candidate sites emerged. These are the same sites identified in the previous project... All of the intakes are compatible with either corridor option in the NOP. The DCA's engineering design processes was clearly based on information from the WaterFix project. At the same meeting, the DCA's Executive Director, Kathryn Mallon, also stated: ...the State Department of Fish & Wildlife, the U.S. of Fish & Wildlife Service and the National Marine Fisheries Service are the primary drivers for identifying constraints and siting criteria for these intakes. The SEC's meeting minutes also record that the DCA was relying on California Department of Fish and Wildlife approvals for the previous project: Ms. Whaley asked if the Department of Fish and Wildlife (DFW) completed a CEQA process for their decision for the WaterFix project as to where the intakes would go? Ms. Buckman said there was a siting study to consider intake locations. DWR led the CEQA effort as the lead agency. DFW completed an incidental take permit related to that application, but all of these have been withdrawn at this point.

541	Deirdre Des Jardins California Water Research/Delta Defenders	The three WaterFix sites described by the DCA's Engineering Manager Phil Ryan are the same as those shown in the Notice of Preparation. During the February 12, 2020 Delta Stakeholder Engagement Committee meeting, Delta Stakeholder Engagement Committee member Karen Mann asked if the Delta Stakeholder Engagement Committee should also be considering different sites for the intakes. The response is recorded in the February 26, 2020 meeting packet: Ms. Marquez reminded members the scoping process is currently underway. If there are suggestions related to alternatives such as alternative locations for the intakes, that comment can be submitted as a scoping comment. There are quite a few constraints that determined what intakes were listed in NOP. The constraints that determined "what intakes were listed in the NOP" are not in the Notice of Preparation. On February 26, 2020 Lindsay Liebig, the Delta agriculture representative to the Delta Stakeholder Engagement Committee, asked if project alternatives that came out of the CEQA scoping process would be given the same consideration as options developed by the Design and Construction Authority and presented to the SEC. This was the response, as recorded in the March 11, 2020 SEC meeting packet: Ms. Liebig asked if the alternatives that come out of the CEQA process based off of scoping comments will be given the same consideration as the options being presented to the SEC. It would be a huge disservice to not give as much consideration to the alternatives suggested by local residents as is being given to the plans discussed in SEC meetings. Ms. Buckman said all alternatives suggested during scoping will be analyzed for their ability to meet the project objectives and/or reduce environmental effects, which determines which alternatives will move forward for further analysis in the EIR. An entire suite of alternatives has already been proposed through scoping comments. Those alternatives suggestions will be narrowed down through the analysis process and included in the EIR for analysis at a similar level of detail.
567	David Abelson	These scoping comments request that DWR broaden the scope of its EIR to include a west-side "Fremont Weir/Yolo Bypass Alternative," as presented in further detail below.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent will the DWR and State of California examine the project under the lens of the Equal Protection Clause in the Fourteenth Amendment of the US Constitution? The clause states that no state shall "deny to any person within its jurisdiction the equal protection of the law." Under modern-day interpretation of this constitutional clause, the enforcement of laws must not lead to inequality of opportunity. If a rational basis review is performed under judicial auspices, and the construction and operation of a single tunnel is shown to lead to an inequality of opportunity between Delta communities and communities receiving water exports derived from the tunnel, will the DWR and State of CA cease and desist project operation?
598	Bill Emlen Solano County	Depending on future changes to the Project to meet management goals and to the extent these future actions have not been analyzed, future environmental review would be required.

602	Patrick Porgans Porgans & Associates	Before the DWR is allowed to pursue this single-tunnel vision, it should be thoroughly scrutinized by the Legislature Analyst Office and undergone an independent financial audit of the entire financing of the SWP, since its inception to date, to do anything less would be a disservice to the people of California. PIA is prepared to assist anyone interested in pursuing these recommendations, and, more importantly, to hold the DWR accountable for its unlawful practices.
610	Henry Kuechler Reclamation District No. 2060	Reclamation Districts within the Delta incorporate by reference its prior comment letters, as well as comments submitted by North State Water Alliance and North Delta Water Agency. Those commenters comments are likewise incorporated by references herein.
612	Warren Bogle Reclamation District 150	Reclamation Districts within the Delta incorporate by reference its prior comment letters, as well as comments submitted by North State Water Alliance and North Delta Water Agency. Those commenters comments are likewise incorporated by references herein.
619	Bob Panzer	Conduct due diligence to make fully informed decisions about the future Delta tunnel.
635	Jim Rich	My comments are from the perspective of an Economist. Other economists have pointed out the folly of the current schedule for the Delta Conveyance Project (DCP) planning studies, which has a Benefit-Cost Analysis and a Financial Analysis for the proposed DCP done after a preferred alternative for the DCP has already been selected. That seems backwards to me, and appears to not follow DWR's own guidelines on the subject, as stated in Guidance for Development of a State-Led Feasibility Study [DWR, Final Draft, DEC 2014]. Page 26 states: "The most efficient way to prepare environmental documentation may be to initiate the process in the second half of the feasibility study process or immediately after the feasibility study is completed, when alternatives are clearly formulated and analyses and adequate information are available to informatively discuss the project and its impact and benefits to the stakeholders." My comments on the NOP focus on a few important problems or weaknesses with that document that are related to economics, and which have received little attention in recent discussions on the wisdom of a proposed large single-tunnel DCP.
637	Osha Meserve Local Agencies of the North Delta	The Draft EIR must also describe actions by other agencies to carry out the project, including"[a] list of related environmental review and consultation requirements [found in] federal, state, or local laws, regulations, or policies. To the fullest extent possible, DWR must integrate CEQA review with these related environmental review and consultation requirements." (CEQA Guidelines, § 15124, subd. (d)(1)(C); see also CEQA Guidelines, § 15006, subd. (i).)
692	Mark Goble	Disgusted with process so far. The original Scoping "workshop" locations were limited to one Los Angeles meeting and a handful of Northern California meetings. Native Americans, who value this State's salmon and rivers far more than most Californians, were completely ignored until public outcry convinced you folks to schedule a Redding meeting.
692	Mark Goble	I am appalled by the D.W.R.'s decision not to suspend this process until the Corona Virus Pandemic has ended.

696	Deborah Duenas	I am requesting that all "public processes" for the Delta (Tunnel) Conveyance project planning be put on hold during the COVID 19 pandemic.
715	Daniel Wilson Reclamation District 3	Reclamation Districts within the Delta incorporate by reference its prior comment letters, as well as comments submitted by North State Water Alliance and North Delta Water Agency. Those commenters comments are likewise incorporated by references herein.
724	Harvey Correia Reclamation District 2067	RD 2067 incorporates by reference its prior comment letters, as well as comments submitted by North State Water Alliance and North Delta Water Agency. Those commenters comments are likewise incorporated by references herein.
730	Reclamation District 551	Reclamation Districts within the Delta incorporate by reference its prior comment letters, as well as comments submitted by North State Water Alliance and North Delta Water Agency. Those commenters comments are likewise incorporated by references herein.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The NOP also evidences apparent intention to violate the Delta Reform Act and California's public trust doctrine, in the course of evading consideration of obvious and required alternatives that would protect California's rivers and restore freshwater flows through the San Francisco Bay-Delta Estuary (Delta) by reducing exports. The Delta is in a state of crisis. The crisis and CEQA require no-Tunnel alternatives.
748	Santa Clara Valley Water District (SCVWD)	Valley Water encourages DWR, the Newsom Administration, and the federal government to quickly resolve their differences regarding the long-term, coordinated operations of the SWP and CVP, and find a path forward for Reclamation and CVP contractors' participation in the Proposed Project.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Introduction, paragraph 2, *"Federal agencies with roles with respect to the project may include approvals or permits issued by the Bureau of Reclamation (Reclamation) ... "* Reclamation does not have any decisions or permits to issue for the project and therefore has no standing in the project unless it opts to become a Delta Conveyance Project Proponent (co-owner).

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Introduction, paragraph 2, *"DWR will prepare an EIR that includes relevant NEPA information where appropriate."* It is at the discretion of the Federal NEPA Lead Agency to determine who will prepare the EIS, not DWR. The NEPA Lead Agency may choose to accept or not accept analysis prepared in coordination with the preparation of a joint EIS/EIR document or it may chose to conduct its own entirely independent EIS, solely at their discretion. DWR claims it will prepare information for the EIS (without agreement from the NEPA Lead Agency), but it has already violated the NEPA requirement for equal level of effort (including information collection and analysis) for all alternatives by initiating an effort to collect additional geologic core samples along its Proposed Project conveyance corridor with no consideration or equal effort applied to alternative conveyance routes or alternative to the tunnel conveyance. If the NEPA Federal Lead Agency agrees to conduct a joint EIS/R document with DWR, after the NEPA Alternatives Scoping and selection process is completed, an equal level of effort in collecting geologic information (and all other information) must be applied to all other alternatives.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Introduction, paragraph 2, *"Once the role of the federal lead agency is established ... "* The role and authority of the NEPA Lead Agency are statutorily defined so it is already established and the federal nexus requiring an EIS are clear as identified in the first comment in this section. The federal Lead Agency must be one that has is dependent upon information developed in the EIS to support decision making in issuing permits for the project. In the first comment in this section we identify that Reclamation has no decision making or permits in the process and that there are three federal agencies that would have to issue permits to the project in order for it to potentially proceed. USFWS and NOAA Fisheries both would have one permit to issue and USACE would have 2 or more permits to issue. USFWS and NOAA must prepare a Biological Assessment (BA) as part of their Section 7 ESA authority. They may take EIS information (or not) and will conduct their own analyses of listed species impacts in their Biological Assessment (BA) document. This mandatory Section 7 ESA document makes the information requirements of the USFWS and NOAA Fisheries less critically dependent upon the EIS than the USACE requirements which are entirely dependent upon decision making information provided in the EIS. The BA document is independent of the EIS so it falls upon the USACE as the appropriate NEPA Federal Lead Agency to conduct the EIS to make all EIS preparation decisions relevant to developing information to support their permit decision making needs.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOI Introduction, paragraph 2, " .. .*federal lead agency will publish a Notice of Intent to formally initiate the NEPA process."* The CEQA NOP and NEPA NOI will have different dates for their environmental baselines due to DWR's lack of federal agency coordination of public notifications for the project. This dis-synchronous environmental baseline will unnecessarily complicate the EIS/R analyses and document. DWR should reissue the NOP at the same time as the NOI so the baselines are compatible to avoid unnecessary over-complication of the EIS/R.

754	William L. Martin	The NOP as drafted excludes numerous areas of concern. These missing sections are required by either statute or judicial decisions. Therefore, the NOP itself is wholly inadequate to begin the drafting of the Draft Environmental Impact Report ("Draft EIR").
754	William L. Martin	The Draft EIR Must Make CEQA-Required Full Environmental Disclosure Related Processes. The Draft EIR must accomplish full environmental disclosure pursuant to CEQA, meaning the Delta Reform Act mandate to reduce, not increase, reliance on the Delta in meeting California's water supply needs must be set forth front and center when preparing responsive alternatives. The danger to public health posed by worsening harmful algal blooms in the Delta and other adverse water quality impacts exacerbated by the proposed project must be disclosed and assessed. To fully comply with CEQA, the Delta Reform Act, and the Governor's Executive Order N-10-19 (the Draft Water Resilience Portfolio), the Draft EIR must disclose and analyze all significant upstream and downstream impacts as well as all cumulative impacts and growth inducing impacts of the Project.
754	William L. Martin	DWR Must Analyze the Impacts of Providing Water to the Entire Project. Pursuant to CEQA, an EIR "must assume that all phases of the project will eventually be built and will need water, and must analyze, to the extent reasonably possible, the impacts of providing water to the entire proposed project." (Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 431.) Moreover, "[t]he future water supplies identified and analyzed must bear a likelihood of actually proving available; speculative sources and unrealistic allocations ("paper water") are insufficient bases for decision-making under CEQA." (Vineyard Area Citizens, 40 Cal.4th at 432.) Thus, the inventory and assessment in the water resilience portfolio required by the Governor's Executive Order N-10-19 are also the types of information required by CEQA to be in an EIR. The Draft EIR must provide this information regarding water needs and the impacts of taking the water. Speculative sources and unrealistic allocations ("paper water") are insufficient bases for decision-making under CEQA.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The CDWA joins in the comments submitted by the South Delta Water Agency on the instant NOP and on DWR and USBR's NOPs for prior iterations of the instant project, which for the most part are still directly applicable to the instant NOP. The CDWA also hereby incorporates by reference the following comments the CDWA submitted on those prior NOPs: – CDWA's May 14, 2009 comments entitled, "Comments on the Department of Interior's Notice of Intent to Prepare (Dated February 13, 2009), and the CA Department of Water Resources' Notice of Preparation of (Dated February 13, 2009), an EIS/EIR for the Bay Delta Conservation Plan." – CDWA's May 19, 2009 comments entitled, "Scoping BDCP NOI 74FR7257 (Feb. 13, 2009) and NOP State Clearinghouse No. 2008032062 (Feb. 13, 2009)." (Copies of those comments are attached hereto as Enclosures No. 1 and 2, respectively.)

800	Joshua Grover California Department of Fish and Wildlife	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB).The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.
800	Joshua Grover California Department of Fish and Wildlife	The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested and final.
824	Christine Ellis	California residents should have the right to vote on major project proposals along with operating parameters. Collecting opinions should be the starting process.
900	Richard Smart	When we deliberate, regarding the issue of the Delta Conveyance Project, we must veer off from political division. We are treading on a vital area of California lands which serves all of life. This riverine system which comprises the Sacramento River and it's Delta is the very source and sustainer of the Great Central Valley of California. This world of land and water is like a heart, delivering vital resources to the body of the state. Please base all decisions about the future of this 'Heart of California' on careful deliberation collaboratively, with respect of maintaining a pristine natural and agricultural landscape.
908	Susan Ludwig	No changes should be made without starting over, getting all environmental impact and scientific studies done before any work begins. The people living in the Delta area need protections against this hijacking of the water, as well as being put under the stress of the impending construction and the noise, dirt and congestion which will surely follow. NO TUNNELS.
909	Donald Ludwig	Since they want to make substantial changes to their plan they need to go through the permit application process starting at square one. Just the same as having a permit to add a 2000 sq ft addition to your home, then changing the plans to demolish the old home and replace it with a new 9000 sq ft structure with 7 bedrooms and 9 bathrooms, and wanting to do that on the same original bedroom building permit.

953	Jan McCleery	Normal EIRs are not 30,000-40,000 pages. Typically, they are several hundred pages. San Diego County, for example, won't accept an EIR more than 100 pages (excluding tables, attachments, and appendices). Even if there are hundreds of pages per alternative considered, the documents should attempt to be efficient and readable. Most CEQA guidelines also state that extraneous and "filler" material must always be omitted from EIRs. Hopefully we will not receive another massive, unreadable document!

Table D-2. Comments Regarding Participation in the EIR/EIS Process

Letter	Commenter Name, Affiliation	Comment Text
20	Bill Emlen Director, Department of Resource Management, Solano County	This letter is written on behalf of the County of Solano ("County"), which may be a responsible agency pursuant to the California Environmental Quality Act ("CEQA") (Pub. Resources Code, § 21000, et seq.) with respect to the project described in the California Department of Water Resources' ("DWR") January 15, 2020 Notice of Preparation of Environmental Impact Report For The Delta Conveyance Project ("NOP").
23	Ryan Hernandez Contra Costa County Water Agency and County of Contra Costa	This letter is written on behalf of the County of Contra Costa ("County") and the Contra Costa County Water Agency ("Water Agency"), which will be responsible agencies pursuant to the California Environmental Quality Act ("CEQA") (Pub. Resources Code,§ 21000, et seq.) with respect to the project described in the California Department of Water Resources' ("DWR") January 15, 2020 Notice of Preparation of Environmental Impact Report For The Delta Conveyance Project ("NOP").
24	William Burke County of Sacramento	This Office represents the County of Sacramento ("COUNTY"), which will be a responsible agency pursuant to the California Environmental Quality Act ("CEQA") (Pub. Resources Code, § 21000, et seq.) with respect to the project described in the California Department of Water Resources' ("DWR") January 15, 2020 "Notice of Preparation of Environmental Impact Report For The Delta Conveyance Project" ("NOP"). This letter is only for the purpose of describing COUNTY'S role as a responsible agency pursuant to CEQA Guidelines sections 15082(b) and 15103.
24	William Burke County of Sacramento	COUNTY will be a responsible agency for the Project, at a minimum, with respect to the following discretionary approvals: Sacramento County Zoning Code approvals for ancillary facilities including, but not limited to, "access roads, barge unloading facilities, concrete batch plants, fuel stations [and] mitigation areas ... " (See NOP, p. 3.) Grading permits pursuant to Sacramento County Code, Chapter 16.44, for ancillary facilities. Permit(s) and reclamation plan(s) pursuant to the Surface Mining & Reclamation Act (Pub. Resources Code,§ 2710 et seq.).
25	Alexandra McCleary San Manuel Band of Mission Indians	The proposed project is located outside of Serrano ancestral territory and, as such, SMBMI will not be requesting consulting party status with the lead agency or requesting to participate in the scoping, development, and/or review of documents created pursuant to legal and regulatory mandates.
30	J. Mark Myles County of San Joaquin	This letter is written on behalf of the County of San Joaquin (County). which will be a responsible agency pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code. § 21000. et seq.) with respect to the project described in the California Department of Water Resources (DWR) January I 5, 2020 Notice of Preparation of Environmental Impact Report For The Delta Conveyance Project (NOP).

30	J. Mark Myles County of San Joaquin	Preliminarily. it appears that discretionary County Zoning Code approvals may be necessary for facilities including, but not limited to, access roads. barge unloading facilities. Concrete batch plants, fuel stations and mitigation areas. Additionally, grading permits may be necessary. The County also has approval authority over geotechnical exploratory drilling, boring and construction of water wells and mitigation monitoring wells, road and highway encroachment permits, and building permits, which are typically ministerial.
50	Michael Tognolini East Bay Municipal Utility District	Given that the Project will require a discretionary approval from EBMUD to cross the Mokelumne Aqueducts ROW, EBMUD is a responsible agency for the Project. See CEQA Guidelines Section 15381 ("For the purposes of CEQA, 'responsible agency' includes all public agencies other than the lead agency which have discretionary approval power over the project.")
55	Phillip Pogledich County of Yolo	This letter is written on behalf of the County of Yolo ("County"), which may be a responsible agency pursuant to the California Environmental Quality Act ("CEQA") (Pub. Resources Code § 21000, et seq.) with respect to the project described in the California Department of Water Resources' ("DWR") January 15, 2020 Notice of Preparation of Environmental Impact Report For The Delta Conveyance Project ("NOP").
80	Dante John Nomellini Sr. Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113 and 2117	These comments are submitted on behalf of Reclamation Districts 548, 404, 684 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113 and 2117. Each of the districts has Reclamation Works consisting of levees, drainage canals and drainage pumping plants. Some have irrigation facilities. RD 2023 operates a cable ferry owned by San Joaquin County, RD 2041 owns and operates a landing craft, and RD 2027 owns and operates a bridge. Each District is governed by a Board of Trustees which controls said works. "Water Code section 50652 Control over works and affairs of district The board shall exercise general supervision and complete control over the construction, maintenance and operation of the reclamation works, and generally over the affairs of the district." Actions which modify, utilize or adversely impact the reclamation works require permission from the impacted district typically in the form of a permit agreement.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	We recommend the project sponsors request that the appropriate environmental regulatory agencies, such as the USACE, the State Department of Fish and Wildlife, and the State Regional Water Quality Control Board, explore the permits, special conditions, and mitigation that may be necessary for construction within the project area.
140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	Provide sufficient time (minimum of 6 months) for public consumption of the draft EIR.
146	Rachel Huang	We demand that the Department of Water Resources listen to the voices of the most impacted communities and that the right decision will be taken.
151	Felice Pace	Please keep me informed.

153	Charles Wilson Southern California Water Coalition	SCWC has organized a coalition of more than 300 organizations statewide that stand in support of a Delta Conveyance solution. The full list can be viewed here: https://www.socalwater.org/supporters. We are always available for collaboration and discussion, and to bring water leaders and experts from across our region and the state together.
154	Jacklyn Shaw	Could you please inform us/me of pending due dates for written comments and public comments against any Terminous tunnel? In particular, it is horrifying to have a Terminous tunnel plan, in Lodi school district area and with recreational marinas. That plan would be 12 miles from Lodi City Hall and Stockton. Such a dust-kicking, empty tunnel is ignorant. It ignores the elected Delta Coalition with Supervisors of five Delta counties. They all wrote and signed that any tunnel would be devastating to the five Delta counties. Over 100 to 200 fresh food crops are grown in San Joaquin County, 2/3 the Delta. (Informed Californians already voted against any water exports from NorCal, around 1982.)
192	Christine Huttinger	One-tunnel has the same problems as the two-tunnel project had. The extensive negative impacts of this project tare not openly being discussed or understood by shareholders.
192	Christine Huttinger	Importantly, as a homeowner who lives on the Sacramento River, has dealt with DWR for years my experience with DWR have been dismal.
220	Stacy Sebring	I am upset there have not been more meetings up North.
220	Stacy Sebring	Please extend the scoping period.
229	Dr. Tom Williams	Please provide a two-week extension to the public comment period.
230	Michael Brodsky Save the California Delta Alliance	Please extend the scoping period.
231	Osha Meserve Local Agencies of the North Delta	Please extend the scoping period.

235	Tim Stroshane Restore the Delta	Again, DWR had to play catch-up during the DCP Notice of Preparation process. Tribal cultural resources were included in the NOP as an issue area for the draft EIR to address, but DWR failed to schedule a public meeting about scoping issues in northern California where affected Indigenous tribes reside. After fourteen years of planning some kind of new Delta conveyance facility (twenty-five when one includes the CalFED process), it was beyond belief and unconscionable to Indigenous peoples of northern California and to us that all seven planned meetings announced in the NOP were to be held in Sacramento and points south. After realizing this error, DWR scheduled a new scoping meeting in Redding (El Pom) March 2nd. Over 200 people from seven tribes attended to oppose the new DCP and ask why Trinity River had been omitted from the NOP's map and from proposed project flows. No other meaningful references to 16northern California Indigenous tribes appeared in the NOP, even though they will be directly and indirectly affected by new DCP construction and operation.
244	Gerald Robbins Western Area Power Administration	WAPA requests active and regular communication throughout the process, particularly if a facet of the project will require a decision or action on WAPA's part. Coordination with WAPA throughout the environmental process is appropriate and necessary to ensure that any action taken by WAPA to construct, remove, replace, install, acquire land, acquire easements, perform environmental reviews, etc. associated with the WAPA transmission system in support of the DCP project is covered under the DCP environmental documents and project description (including required mitigation).
247	Jeffrey Kightlinger Metropolitan Water District of Southern California	Met is a potential Responsible Agency under CEQA for this project and the Department and the EIR should acknowledge this status. CEQA defines a Responsible Agency as one, other than the lead agency, "which has responsibility for carrying out or approving a project". The CEQA Guidelines expand that definition: "the term 'responsible agency' includes all public agencies other than the lead agency which have discretionary approval power over the project." (CEQA Guidelines 15381). The SWC and DWR are currently exploring potential amendments to the SWP contracts to allocate the costs and benefits of a Delta conveyance facility. The potential discretionary decision to approve new contracts or provide funding for a Delta conveyance project qualifies the SWP contractors such as Met as potential Responsible Agencies. As a potential Responsible Agency under CEQA, Met should have an enhanced role in consulting with DWR on the scope and the contents of the Draft EIR.

248	Tom Williams	Provide Scoping Summary Report within 60 days of closing Scoping period and provide monthly online updating of the draft SSR. Environmental Manager's Report Contact: Carolyn Buckman, DWR Environmental Manager Date: March 19, 2020 Item No. 10c Subject: Environmental Manager's Report Summary: The Department of Water Resources (DWR) is conducting scoping to begin the California Environmental Quality Act (CEQA) process to analyze a single-tunnel solution to modernizing and rehabilitating the water distribution system in the Delta. Provide Public with a standard Definitions/Glossary of terms used and their numerical use. Provide definitions and quantification of specific terms: practical, feasible, reasonable, and adequate. Provide Publicly Accessible information through direct WWW-links, appendices, and responses to Scoping comments. Provide dictation in an appendix or direct link via DWR webpages involving any "personal communications" references. Provide all footnotes to be included in a bibliography or list of references, with appropriate linkages for direct Public access. Provide Qualifications of all "Preparers" and their corporate affiliations for 2010-2021. Provide a separate summary with web-links to sources for all specific details provided by agencies within 60 days of closure of Scoping, including scopes, significant issues and impacts, reasonable and unreasonable alternatives, and all mitigations, monitoring, reporting recommendations, and responsibilities.
248	Tom Williams	Provide clarification regarding the Scoping for this Project (DC) and an unexpanded Scoping for other projects.
248	Tom Williams	Provide definitions and clarification for use of vague terms used throughout the NOP, such as: will also involve , likely requiring, may include, anticipated...NEPA compliance, relevant NEPA information, once established, federal lead agency vs Lead Agency, and if appropriate. Provide clear and thorough definitions, numerical ranges, and specific quantified terms for: More reliably capture, Water during and after storm events, Protect existing supplies, Threats, Climate change, Sea level rise (averaged, HHT and LLT), Earthquakes (RM -1 – 7, 0.1 – 0.5 G), Pursuing, and Local supply resiliency projects Provide clear and thorough clarified glossary and definitions, numerical ranges, and specific quantified terms for: "Background information", DW Roundtable, Conveyance, "Major issues facing the Delta", Levees, Flood protection, Water quality, Farmland preservation, and Invasive species. quality, farmland preservation and aquatic invasive species. Provide clear and thorough clarified glossary and definitions, numerical ranges, and specific quantified terms for: Opportunities and "Other permits and environment review processes". Provide clear and thorough clarified glossary, listings, and definitions, background document links, numerical ranges, and specific quantified terms for: List of all SWP contractors, current allocation and future allocation with 7500cfs, Cost Allocation Methodology, Assess, potential, associated, Reasonably foreseeable potential, Contract modifications, and Preliminary contract negotiations. Provide clear and thorough clarified glossary and definitions, numerical ranges, and specific quantified terms for: Cost estimates, B/C Analysis, Financial Analysis, and Operations.

248	Tom Williams	Withdraw and revise current CEQA documents (NOP, IS, and Assessment of Significance) and recirculate as combined EIR/EIS with appropriate state and federal documents. As indicated below, provide the inclusive document for Public Scoping Review and Scoping.
251	Loren Rhodes	Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?
252	Sherri Venezia	My position "advocates for local Delta stakeholders to ensure that they have a direct impact on water management decisions affecting the water quality and well-being of their communities, and water sustainability policies for all Californians. We work through public education and outreach so that all Californians recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration. We fight for a Delta whose waters are fishable, swimmable, drinkable, and farmable, supporting the health of the San Francisco Bay-Delta Estuary, and the ocean beyond. Our coalition envisions the Sacramento-San Joaquin Delta as a place where a vibrant local economy, tourism, recreation, farming, wildlife, and fisheries thrive as a result of resident efforts to protect our waterway commons."
255	Sandy Rhodes	Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?
261	Regina Chichizole	Are you planning to have any meetings north of Sacramento? There are no meetings scheduled in the part of the state, and a lot of people from Redding and Trinity River areas are very concerned.
262	Regina Chichizole Save California Salmon	I am fairly insulted that there are no north state meetings on this. There was also very few north state meetings on the water portfolio, and the fact that the water portfolio prioritizes the tunnel in the Sites Reservoir with -- and then the hearings are going forward before the comment period even ends on the water portfolio kind of shows that our voices really don't matter. The governor is moving forward in the way that he wants, and he's not prioritizing the fish and he's not prioritizing the north state. He's only prioritizing water brokers, because truthfully, the cities are saving water. It's the people who are selling water that want these projects.
268	James Dunlap	There should be a meeting in the North State. You've seemingly scheduled these meetings for the beneficiaries of the south state that will get water and nothing for those adversely affected in the north state. That needs to be remedied.
269	Jeff Durbin	Hold a meeting in the north state.
271	Isaac Kinney	You need to hold a meeting in the north state because the project will impact indigenous peoples.
279	Margaret Robbins	I request that you go further north to get comments from the people who live along the Trinity and Klamath Rivers, because this does affect us.
280	Bob Saunders	I feel the public interest has not been taken seriously and there have been many, many meetings that have taken place behind closed doors.

280	Bob Saunders	Sit down with the tribes to consult on the project
286	Roberto Valdez	I encourage everybody to get involved in this project.
295	Connor Everts Environmental Water Caucus	Hold a scoping meeting in the north state.
303	Robert Hunter Municipal Water District of Orange County	Trust is an essential component in this effort. I've heard in Northern California people say, "You can't trust DWR because they won't enforce export restrictions." And in Southern California I've heard, "You can't trust DWR to manage $273 million of other people's money."
319	Tom Williams	Requested extension of the 032020 deadline which was not responded to or given. See attached for other comments. Comment letter includes attachment.
326	Orion Camero	Now, I've -- as you can hear from everyone that has spoken, I feel like everyone said a piece of this massive beautiful mosaic of this community that says no to this project, and that you actually listened to folks that are directly impacted for us to create the solutions.
327	Jasmine Delafrost	And I hope that we can also – like if we look around this room, there's a lot of young people and other people who are not here today, and that we do come back to make sure that those who live in our communities and those who are most impacted are in the part of the conversations. I know that you're here today, obviously, to do that. But that we do it again to meet with more folks. And there's people in the room who want to ensure that young people and families that aren't represented in this room today are here at this conversation.
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	It is significant that no public hearings or scoping meetings have been scheduled until just now, north of the Delta in the Trinity, Klamath, and Sacramento River watersheds. And, as Ms. Barrigan clearly pointed out, the Trinity and Klamath watersheds are not necessarily all that close to Redding.
338	James McGraw	Anyways, what I've looked at and I've been hearing all around everybody is everybody is saying not to build these tunnels. Yet, like other people are mentioning, you guys have it set in your heads that oh, we're building the tunnels. We're going to hold this little thing to look like we're doing something. Record it as proof and evidence that we did something. But we're still going to pass this because we're the government.
338	James McGraw	But this entire time, I just notice you guys don't care. And the entire time, you're taking all of this documented information and you're making this big old scene like you guys care. But, really, you're not going to do anything. I've lived on the Delta for seven years and just turned eighteen. But I've seen enough out there to know that you guys just don't care about it.
342	Darius Waiters	I just wanted to share my thoughts on the tunnels with a little poem I wrote: "And yet again, the Delta and its people have been overlooked, disregarded, stepped upon from people that don't even care to know who they're stealing from.

345	Barbara Barrigan Parilla Restore the Delta	You had the map up, figure two of the NOP. The project runs from Trinity County to the Mexican border. If that's the total impacted area of the project, I am curious why there isn't a scoping meeting in Trinity, because it takes two to three hours to get from Trinity County to Redding. Why isn't there a scoping meeting in San Diego where you have rate payers paying the highest rates of water in the state? And why weren't there scoping meetings for East L.A., Compton, South Central L.A., Maywood, Downey and Paramount, are other environmental justice brothers and sisters in California.
365	Brian Dawson Sierra Club of California	Is there a legally mandated timeline as to when you are supposed to release both the scoping report and also the Draft EIR?
372	Mary Elizabeth	My question was also about the scoping summary report, the formulate, the project development report, and then the technical report. So there's going to be a number of associated technical reports. And I just wanted to make sure that all of those intermediary reports will be available to the public before the DEIR.
392	Katja Irvin	There needs to be more public input along the way. Not just the Environmental Impact Report but other things. I mean, more input into the environmental issues than the Environmental Impact Report.
394	Mariah Looney Restore the Delta	We're extremely concerned that there are no scoping meetings planned for the environmental justice communities in Fresno or in southeast L.A.
404	Dr. Steven White	There is a real need for technical expertise, and we can't see any of it. Any of it. And we won't see it until you give us the Draft EIR, which was then too late. So I'm encouraging you to open up the process so that experts can help you.
482	Chief Sisk Winnemem Wintu Tribe	There needs to be a better process where you are meeting with people's questions. You know, this -- this meeting is unacceptable when you can't allow all the speakers to talk. Another meeting should be scheduled when you come across a community that has this many concerned citizens about the water issues. When will the questions asked at these meetings, because I've been to several, be answered? And how will they be answered. So far none of my questions have come up with an answer. No one has come back to me and said oh, we took that comment that you made and we found out about it. But see this water here, this is from Mount Shasta, and we are the people who pray for that water, and that water goes all the way to LA and San Diego. And so these things need to be considered when you're taking our cards, taking our notes. How are you going to get back to us, and you need to reschedule a meeting here.

494	Jim and Linda Hall	I am a central California resident and deeply concerned about the Water Conveyance Proposals that are continuing to be put forth without the ability of residents to participate. I happen to be stuck in Hawaii (I know, I get very little sympathy about this). None the less, I, like many others are not able to get back and participate in this process due to COVID policies and restrictions put forth by various governments and common sense. Your continued actions, without taking into account the real impact on the people involved during these unique times, are counter to public interest, the public process and full transparency. I urge you to delay any further actions until this crisis is over. It is highly likely that any actions you take during this time will be deemed an illegal process in a court case. Government restrictions on travel, both federal and California, have prohibited the public participation and full due process in these activities and as such, your Department can not take advantage to streamline and fast track or even "business as usual" your functions at the expense of those citizens directly affected. Please revise your process to take this into account until we are over the crisis.
503	Michael Brodsky Save the California Delta Alliance	The notice of preparation defines the range of alternatives. It's been written to exclude everything except Delta Conveyance. So the major decisions have been made before you go to these scoping meetings, but we're going to insist that you study non-tunnel alternatives.
521	Mike Moran Big Break Visitors Center	Invited the project team and meeting attendees to the Big Break Visitors Center to see the area and learn about issues in the Delta.
527	Keri Richards	Is there anything that anyone here can say that will change the course of the mission? I hope you take and evaluation the information people have given tonight (at the scoping meeting).
532	Carla Sign	Who are the decision makers for this project that DWR will be consulting with on alternatives?
540	Cheryl Madrigal Rincon Band of Luiseño Indians	The Rincon Band is concerned that due to COVID-19 Tribes are prevented to more actively participate in consultation to express their concerns regarding the Delta Conveyance Project. Many Tribal Historic Preservation Offices have closed, or key staff put on furlough, making it impossible for Tribes to attend(virtual) meetings. The Band understands that DWR has extended some of the comment periods, however, we recommend to pause the project and enter into meaningful consultation with the local Tribes at a later time. This proposed project will have huge impacts on local tribal communities and DWR should postpone consultations until the COVID-19 crisis is under control.
540	Cheryl Madrigal Rincon Band of Luiseño Indians	The Rincon Band reserves its right to continue to fully participate in the environmental review process and to review and submit additional information during the public review process.

541	Deirdre Des Jardins California Water Research/Delta Defenders	Please accept this letter on behalf of the Delta Defenders in response to the requirement that scoping comments be submitted despite the ravages of the COVID-19 pandemic crisis. The Department of Water Resources (DWR) has been asked by the Delta Protection Commission, Delta Counties, Delta residents, Delta business owners, Delta community-based organizations, Tribal representatives, fishing and non-governmental organizations to pause Delta tunnel planning processes that require public participation due to the impact of the COVID-19 pandemic. We, Delta Defenders, sent a letter to DWR Director Karla Nemeth on March 16 calling for a pause in Delta tunnel stakeholder engagement processes. We cited the effects of the pandemic on Delta Counties, Delta Cities, Delta legacy cities, Delta legacy communities, Delta businesses and Delta residents. On April 7, the Delta Counties Coalition sent a letter to Natural Resources Secretary Wade Crowfoot requesting that Delta Conveyance Project planning and engineering design processes that require Delta stakeholder engagement be put on hold. That letter states in part: "The Delta Counties Coalition (DCC) respectfully requests that you direct the Department of Water Resources (DWR) to pause all Delta Conveyance Project planning and engineering design processes that require Delta stakeholder engagement during the COVID-19 crisis, until the public can fully participate. We request you ask the Delta Conveyance Design and Construction Authority (DCA) to pause its processes that require public participation, including Stakeholder Engagement Committee meetings, so that the Delta tunnel engineering design can be informed by meaningful public input. We also ask that you direct DWR and other resource agencies to extend public comment periods by at least 45 days beyond the end of the declared emergency. " On April 9, Restore the Delta sent a similar request to Governor Newsom. The requirement for Delta stakeholders to submit scoping comments during a national and state public health emergency and a major disasters yet another example of DWR's attempt to rush forward with this project in blatant disregard for Delta stakeholders' deeply disturbing and is directly contrary to the policy of the state as enacted by the legislature in Public Resources Code 21000 et. seq. Public Resources Code section 21002 states in part "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (underlining added.) Delta stakeholders must submit comments during the scoping comment period, but are unable to participate in scoping due to the COVID-19 crisis. As a result, they will be denied the opportunity suggest feasible alternatives to be studied in detail as part of the CEQA process. This has created a sham CEQA process and raises fundamental issues of abuse of discretion. Setting the deadline for scoping comments in the middle of a pandemic defeats the very purpose of scoping comments.

541	Deirdre Des Jardins California Water Research/Delta Defenders	But Delta stakeholders are affected by the shutdown, and have almost no capacity to meet with engineers or other technical experts and consider or develop alternatives for the intake sites. By constraining consideration of alternatives to those submitted during scoping, DWR continues with the same disregard it has demonstrated since the onset of the pandemic. This is a time of dire crisis. It is a time for administrative flexibility, not rigid disregard for the communities most affected by the Delta tunnel planning process. The actions of DWR are the antithesis of equity and fairness expected of governmental bodies and are an abuse of discretion.
541	Deirdre Des Jardins California Water Research/Delta Defenders	We ask that the Department of Water Resources cure this deficiency by providing full and complete disclosure of all studies and other technical information used in determining the intake sites and tunnel corridors in the Notice of Preparation, and providing an opportunity for Delta stakeholders to submit suggestions for alternatives to be considered as part of the EIR and part of the engineering design process, 45 days after the end of the current public health emergency.
542	Bruce Campbell	Despite it being very clear that one of the three "geographic regions" which is to be examined in the DEIR is the "upstream from Delta" area, yet not only is "environmental justice" never mentioned in the Notice of Preparation, but there were no initial plans for any hearing north of Sacramento on scoping for the DCP's forthcoming EIR. Apparently some prodding eventually resulted in just one hearing north of Sacramento – in Redding – an area known as a place for environmentalists to be beaten up after hearings (if what I heard when living in northern California in the late 1980s is any indication). Excuse me, your choice of a hearing site was still pretty far away from the main concentrated land and water-based indigenous tribes of the Trinity – Klamath watershed! Also, a number of coastal areas of the state tend to be populated with those who have more environmental stewardship tendencies, and I will point out that the North Coast area with its concentration of both native peoples and environmentalists was not granted a hearing despite the serious impacts of what raiding more Trinity River water for the Central Valley means for the largest watercourse / watershed in the region which is the Klamath – Trinity River watershed system with species implications extending into the Pacific Ocean as well.
551	J. Mark Myles County of San Joaquin	DWR must conduct a transparent and thorough environmental review of the project's numerous potentially significant impacts.
552	Nicole Suard Snug Harbor Resorts	Please define the role of DWR and DWR consultants. Based upon DWR website, that agency is supposed to protect drinking water quality for all Californians, not just counties and corporations that comprise the membership of State Water Contractors. During the California Waterfix hearings, DWR provided ample legal resources to promote the desire of the State Water Contractors, and no legal resources to protect the needs and rights of Californians not included int he State Water Contractors sphere of service. Funding for legal representation, computer modelers, scientists and witnesses should be provided by the state to protect the interests of the rest of DWR's responsibility area.

552	Nicole Suard Snug Harbor Resorts	Please make sure that all reports, computer modeling, maps and data are presented in human-readable format for persons who do not have special software programs or expensive computers. Please provide the baseline data for all computer modeling in a format accessible to the general public. As much as possible please provide the reports and data in the various languages most commonly utilized in the Delta region, so that all potentially affected local persons can be able to read and understand the DWR/SWC proposal and impacts.
552	Nicole Suard Snug Harbor Resorts	Please provide easily comprehendible graphics which are correctly labeled for important data. For example, for each waterway in the Delta, baseline data and graphics should be provided which indicates the minimum amount of flow that will continue in each of those waterways for every day of the year, or at a minimum monthly. Provide actual daily minimum flows, not averages. There should be comparative data showing minimum flows year-round prior to 1998 for an average flow year, compared to the diversions that have been allowed the last 10to 15 years, compared to the proposed remainder flows under a new conveyance project.
555	Jeffrey P. Sutton Tehama Colusa Canal Authority	We are hopeful that the Project proponents will look to improve on the past unsuccessful efforts on this Project, and instead attempt to address the shortcomings and concerns of stakeholders and potentially affected parties upfront to shape this effort in way that could garner broader support. Such an effort will require early and often opportunities to review detailed plans and operations during the development phase of this effort to achieve that goal.
559	Rev. Dr. Richard Stinson Livingston United Methodist Church	Please extend the scoping period until after the novel coronavirus pandemic has impacted the Delta Community.
569	Karen Mann Save the CA Delta Alliance	It appears that SEC group was set up just as a PR stunt to show that you are listening. However, ARE YOU listening??? The Delta Business Community is VERY MUCH against the construction of the proposed tunnel through the natural resource which is precious to the State of California historically as well as a good support of the natural ecology of the area. Birds, fish, wildlife, farmers, ranchers, marinas, campgrounds, fishermen, hunters, families enjoy and thrive due to the presence of the California Delta.
598	Bill Emlen Solano County	In a letter dated February 14, 2020, the County, as a Responsible Agency, provided comments to DWR within 30 days of the NOP pursuant to CEQA Guidelines sections 15082, subdivision (b) and 15103. The comments provided in this letter are to supplement those other comments
600	Lucas Brown	I write to encourage a stay on the Delta tunnel decision processes during the Covid crisis, recognizing the immense difficulties it is creating for all peoples, but particular those of Indigenous communities. In order to respect their voices it is critical that they have consultation and presence in any decision regarding the Delta Tunnel. Recognizing the challenges of the stay at home orders, any fast tracking of this project would be detrimental to their needs and inevitably be harmful to all of us. Within your powers I strongly encourage you to postpone any movement on this project until equitable representation can be present.

602	Patrick Porgans Porgans & Associates	Patrick Porgans I Associates (PIA) was an active participant and respondent on all of the aforementioned proposed projects. PIA attended countless meetings and submitted endless reams of written comments providing documentation as to why each of those "alternative" proposals/plans were doomed to fail. In the process, like so many other participants, PIA had to expend and inordinate amount of time, years of our lives, and an immeasurable sum of our own funds to participate in the process. While DWR and SWP contractors paid a portion of the cost for these endless studies and ineffective plans and programs, the bulk of the billions-of-dollars expended have and will continued to be paid for by Californians from the state's General Fund.
619	Bob Panzer	Conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the cost of the proposed project and water outcomes.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct substantive consultation, including disclosure and discussion of all alternatives and mitigation measures for the Project, with the Clarksburg Community, land use agencies, special districts (such as the reclamation and fire districts) and advisory bodies which represent the Residents, each of the Residents, and the Clarksburg Community, and each significant part of the Clarksburg Community.
621	Susan Simpson	I heard that you are trying to hold meetings during this coronavirus epidemic! Sure seems like you are trying to sneak something past, while everyone is distracted with this crisis!
627	Nichelle Garcia	Suspend project activity because the public's ability to participate and have a voice in this project has been drastically stilted by the COVID-19 pandemic. To proceed via teleconferencing or online meetings would be inherently inequitable and discriminatory, especially toward communities who are coincidentally the largest stakeholders.
627	Nichelle Garcia	As required by the UN Declaration on the Rights of Indigenous People, the Department of Water Resources must seek out the free, prior and informed consent of the tribes before greenlighting this project.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	We appreciate that the Department of Water Resources (DWR) engaged extra outreach for the scoping meetings; however more is needed for a project of this scope. Environmental Justice, Human Right to Water, and Affordability are areas which require more focused outreach and analysis. The DWR should be preparing white papers that provide information to stakeholders to evaluate initial findings, including the analysis behind those findings, so that when the DEIR is complete, stakeholders have had an opportunity to become educated and provide relevant comments. Special consideration and analysis should be prepared for the disadvantaged communities within the area of construction.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	Will California's key water agencies, including DWR conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes during the development of the DEIR?

637	Osha Meserve Local Agencies of the North Delta	As an initial matter, LAND objects to DWR's failure to extend the comment period on the NOP, given that the state is essentially shut down right now with the COVID-19 pandemic. Notably, planning for the Delta Conveyance Project is not part of essential work as defined in the Governor's COVID-19 orders, and the public processes around it should be paused until it is possible for the public to meaningfully engage. In any case, DWR must fully analyze the environmental impacts of the project in its Draft Environmental Impact Report("EIR")for the project.
638	Carol Moon Goldberg League of Women Voters of CA	It is significant that no public hearings have been scheduled north of the Delta in the Trinity and Klamath watersheds on which the Central Valley Project (CVP), which is identified in the Notice of Preparation (NOP) as a potential beneficiary, relies. For the Sacramento River watershed, a scoping meeting was added in Redding only in response to public pressure. Even in areas where the Stakeholder Engagement Committee is actually being asked to engage, actions like predetermination of Delta tunnel intake locations— and assumption of the inevitability of a tunnel conveyance— inappropriately deprive the committee of meaningful input.
664	Roberto Valdez	Please add me to your contact list of DCP Stakeholders.
668	Jacklyn Shaw	Where is AVAILABILITY of Conveyance map/ options to public news? Residents, rural and urban, are not aware of the DELTA MAP PLANS? Why not?
674	David Guy Northern California Water Association	Sacramento River Basin water resources managers encourage the Administration and project proponents to collaborate with them on a solution for modern Delta conveyance that does not redirect impacts (water supply, environmental and financial) to the Sacramento River Basin, thus avoiding impacts to the region's special mosaic of farms, cities and rural communities, fish, birds, and recreation. To achieve these objectives, it will be essential to demonstrate how the Central Valley Project and State Water Project can be operated to support modern Delta conveyance, the co-equal goals, and protecting the Delta as a place--while continuing to serve multiple beneficial uses in the Sacramento River Basin and promote regional water sustainability for all of these beneficial purposes.
675	Terrie Mitchell Sacramento Regional County Sanitation District	In addition, DWR must not repeat the error made with WaterFix in assuming, without evidence or analysis, that an undefined operational protocol for the Delta Conveyance Project intakes will be capable of mitigating Delta Conveyance Project impacts. As it prepares the draft EIR, DWR should consult with Regional Sa non both the appropriate methodology for impact assessment and to determine whether there are feasible means of avoiding impacts to SRWTP operations.
679	Chris Lish	Please do NOT add my name to your mailing list.
686	Mark Goble	It is therefore unreasonable for you to expect Public Commentary to be made on the Tunnel Project. In fact, it is beyond unreasonable, and makes one believe another "fast one" is being pulled off by the "water people" again.

694	Delta Counties Coalition	This letter is submitted on behalf of the Delta Counties Coalition ("DCC"), a coalition of elected members from Contra Costa, Sacramento, San Joaquin, Solano, and Yolo counties. As the majority of the Project footprint is within the lands and waters within the Delta, DCC members request to be duly informed of project developments and remind the Department of Water Resources ("DWR") of the counties' roles as responsible agencies. DCC has spent the past decade advocating for genuine Statewide water solutions that support all communities, and is correspondingly disheartened by DWR's decision to proceed with a Delta tunnel, instead of more cost-effective and environmentally-friendly alternatives.
697	Delta Independent Science Board	On behalf of the Delta ISB, we write with two goals: (1) to invite a DWR representative to attend a future meeting of the Delta ISB to discuss the process and timeline for our review of the EIR documents for the Delta Conveyance Project. The Delta ISB leadership sees tremendous opportunity in having the Delta Conveyance Project leadership attend one of our meetings early in the development of the EIR documents, so we can discuss the best approaches for providing scientific review of the EIR documents for the Delta Conveyance Project, as required by the 2009 Delta legislation. Because several members of the Delta ISB will be rotating off the Delta ISB at the end of August2020, it would be advantageous for representatives from DWR to attend a Delta ISB meeting either in August when both existing and new members of the Delta ISB will be meeting or during fall 2020 after new Delta ISB members have begun their terms.
698	Steve Lambert Butte County Board of Supervisors	Butte County hopes that the DCP will not follow the failed attempts of the BDCP and California WaterFix. Butte County actively engaged in the BDCP and WaterFix processes and offered construction recommendations over the course of its development. The Butte County Board of Supervisors submitted comments on the BDCP Scoping Document (May 14, 2009), requested the formation of a Local Issues Group (March 30, 2010), and commented on the BDCP Public Release Draft (December 14, 2010). On July 25, 2012, the state and federal agencies released documents describing their preferred plan for BDCP. The preferred plan did not address the concerns previously submitted by Butte County. On August 14, 2012, the Butte County Board of Supervisors adopted a Resolution of Opposition to the BDCP. Butte County's list of concerns with the BDCP/WaterFix is more than legal technicalities; the failures would have led to actions that would have ultimately damaged the regions' economy, environment and community. Unfortunately, the previous administration ignored every suggestion offered by Butte County and intended to move forward with little regard to legal requirements or mitigating impact. We applaud Governor Newsom for putting an end to the WaterFix project. As DWR begins the new Delta Conveyance Process, we implore DWR to avoid the flawed path of the BDCP/WaterFix.

698	Steve Lambert Butte County Board of Supervisors	The EIR for the DCP must comply with State water law and fully assess the environmental and socioeconomic impacts, including those in the northern Sacramento Valley. If the actions of the DCP would result in damage to the region's economy, environment and communities, the Butte County Board of Supervisors would vehemently oppose the DCP and will consider taking appropriate means to protect the County's economy, environment and communities. However, we remain hopeful that the DCP represents a new approach to address water supply reliability and ecosystem restoration in the Delta.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR's refusal to relax the April 17, 2020 comment deadline despite statewide shelter-in-place restrictions on the public is irresponsible. DWR should have delayed work on this Project indefinitely in recognition of the emergency conditions unleashed by the Covid-19 pandemic.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR's analysis of the proposed Project, its alternatives, and measures to mitigate its significant impacts must also include the information necessary for responsible agencies to conduct their own review of the Project. Habitat and Watershed Caretakers v. City of Santa Cruz (2013) 213 Cal.App.4th 1277, 1305.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	CEQA requires DWR to consult with any California Native American tribe that requests consultation and that is traditionally and culturally affiliated with the geographic area of the proposed project. PRC§§ 21084.2, 21080.3.1. The Winnemem Wintu Tribe is such a tribe, as it is traditionally and culturally affiliated with land and resources within the Project area (NOP 6-7) and thus its cultural resources may suffer such impacts. This consultation is necessary to determine whether the Project "may cause a substantial adverse change in the significance of a tribal cultural resource." PRC§§ 21084.2 (quote) 21074 (defining tribal cultural resource). The Winnemem Wintu Tribe's traditional cultural practices along the McCloud River, and its historical, spiritual, and subsistence relationship to the McCloud River Chinook salmon, should be considered and addressed as part of this required tribal consultation. Therefore DWR must consult with the Winnemem Wintu Tribe regarding concerns pertinent to its cultural places and traditional practices, and alternatives or measures to mitigate impacts to cultural resources before circulating a draft Environmental Impact Report. PRC§§ 21080.3.1, 21084.3.

702	Frank Toriello We Advocate Through Environmental Review	Any public hearings related to this project must also be held in the far northern part of the state (e.g., Redding and Yreka).
703	Gabrielle Broche	As you know, the Redding site was added only because many Northern Tribal members complained at the Sacramento scoping event that all the water project meetings were held in Central and Southern California. It is a disgraceful oversight of the scopes committee not to include communities where the water comes from.
703	Gabrielle Broche	The scope of the EIR is insufficient. The Trinity River complex is not included, nor the Feather River complex.
703	Gabrielle Broche	If the EIR is honest with it's intentions, then reopen the scopes timeline, broaden input to include all that are directly effected. Consequently, creating an advisory board representing these areas can be formed. Inviting community leaders to join.
707	Elaine Barut Little Manila Rising	Need for Education About Project Impacts 1. Core Issue: We are allowed to submit comments, but we aren't really that knowledgeable about the impacts and don't have a lot of time to read a huge report. Solutions: ○ Please help the public understand the impacts. People need to be actively equipped with knowledge about project impacts. DWR needs to provide enough information, but also needs to make it short enough and clear enough to be accessible. ○ DWR needs to make the EIR accessible to a lay person in South Stockton. The language needs to be understandable for as many people as possible, including those who are not very educated about the issue and don't have prior knowledge. 2. More people need to know about the project and its potential impacts. Please increase publicity about the project and its potential impacts. Disseminate information widely, so it is in everyone's hands. 3. Make sure the public has adequate time to digest the impacts in the EIR.
707	Elaine Barut Little Manila Rising	Participation & Decision-Making 4. I am concerned about how communities will continue to participate in the decision process after the EIR is released. How could we make the engagement process more community-led during the environmental review and beyond the environmental review? How can we make it more participatory and more democratic? 5. The process is undemocratic. People can comment on the EIR, but they can't vote on the final outcome. How will the public, especially people who are living within this community (Stockton), become involved with the decision making?

710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	The ARWA are encouraged by DWR's recent attention to measures to protect Folsom Reservoir storage and the lower American River. The ARWA strongly encourage DWR to continue to incorporate these measures in its environmental analysis of the revised Delta-conveyance Project and are available to consult with DWR as it prepared the EIR modeling and analyses.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	First, we request that planning for this ill-advised project take a backseat during this COVID-19 crisis. Please extend the deadline for public comment on the Delta Conveyance Project to a later time when the community can connect to discuss and prepare adequately. Broadband communication in the Delta is very limited which has prevented community members to meet and to access information from the state agencies regarding this project. It would be irresponsible for the state to move forward knowing that the affected region cannot participate or even receive updates on the project that will greatly harm them. Our families need to focus on their health and their farming operations.
712	Gwen Cauthren	Request for Stay of Public Processes for Delta Conveyance planning during Novel COVID-19 pandemic
714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	Request for Notification of any and all opportunities for public comment on this proposed project.
718	David Strecker San Joaquin Farm Bureau Federation	First, we request that planning for this ill-advised project take a backseat during this COVID-19 crisis. Please extend the deadline for public comment on the Delta Conveyance Project to a later time when the community can connect to discuss and prepare adequately. Broadband communication in the Delta is very limited which has prevented community members to meet and to access information from the state agencies regarding this project. It would be irresponsible for the state to move forward knowing that the affected region cannot participate or even receive updates on the project that will greatly harm them. Our families need to focus on their health and their farming operations.
719	North Delta C.A.R.E.S.	We, therefore, respectfully request that you extend the due date for the Delta Conveyance Scoping Comments to 45 days after the COVID19 pandemic is over.
720	Eric Gillies State Lands Commission	Thank you for the opportunity to comment on the NOP for the Project. As a responsible agency, Commission staff requests that you keep us advised of changes to the Project Description and all other important developments. Please send additional information on the Project to the Commission staff listed below as the Draft EIR is being prepared.
722	Barbara Steinberg	I ask for a stay of all Delta Conveyance Project public processes until 45 days after the COVID 19 pandemic subsides to safe levels.

726	Roger Cornwell Sacramento River Settlement Contractors	Through the Northern California Water Association and the North State Water Alliance, the SRS Contractors have been active participants in previous planning and projects regarding conveyance in the Bay-Delta and we look forward to continuing a productive dialogue on DWR's proposal for a new Delta Conveyance Project. The SRS Contractors encourage the Administration and project proponents to collaborate with them on a solution for modern Delta conveyance that does not redirect impacts (water supply, environmental and financial) to the Sacramento River Basin, thus avoiding impacts to the region's special mosaic of farms, cities and rural communities, fish, birds, and recreation. To achieve these objectives, it will be essential to demonstrate how the Central Valley Project and State Water Project can be operated to support modern Delta conveyance, the co-equal goals, and protecting the Delta as a place--while continuing to serve multiple beneficial uses in the Sacramento River Basin and promote regional water sustainability for all of these beneficial purposes.
726	Roger Cornwell Sacramento River Settlement Contractors	The SRS Contractors are prepared to fully engage with DWR and proponents of the Delta Conveyance Project as they develop operational criteria to ensure that operation of the proposed Delta Conveyance Project does not re-direct impacts to the Sacramento Valley. The SRS Contractors look forward to the opportunity to review the draft EIR and its proposed operations criteria.
729	Erik Vink Delta Protection Commission	In response to the NOP, this letter sets forth the broad principles that serve as the foundation for the attached document detailing issue-by-issue comments. As with the predecessor conveyance proposals, a tunnel through the Delta will irreversibly damage Delta agriculture, recreation, cultural and natural resources. This letter presents our assessment of the potential impacts, offers promising alternatives and effective and feasible mitigation measures for consideration, and reaffirms our position that previously ill defined impacts - or those not defined at all in previous environmental review - must now receive the attention they require.
729	Erik Vink Delta Protection Commission	Listen to Delta People. The Delta is a complex place. No one knows it better than those who live, work, and recreate there and the local governments who represent them. Involving these Delta people will be essential to understanding the project's effects and how to avoid or reduce them. The Bay-Delta Conservation Plan (BDCP) began by excluding many local stakeholders from discussions about it. Many Delta people felt excluded from substantive involvement in the BDCP EIR as well. The sense of skepticism that resulted will be difficult to overcome. But DWR has gained valuable experience developing constructive working relationships with wildlife and fish agencies that can be applied to working with people in the Delta. The Delta Conveyance Design and Construction Authority (DCA) outreach effort with its Stakeholder Engagement Committee (SEC) is a start, but should supplement, not substitute for consultation. DWR's outreach and listening effort should extend beyond pro forma California Environmental Quality Act (CEQA) notifications. The alternative is further decades of gridlock and impasse.

729	Erik Vink Delta Protection Commission	Be Readable. As noted by the Delta Independent Science Board, the circumstances surrounding impact assessment of a conveyance project demand that the environmental review "go beyond legal compliance," that it have "extraordinary completeness and clarity," that it be "exceptionally clear about the scientific and comparative aspects of both environmental impacts and project performance." The EIR should include summaries of impacts, by chapter, written plainly and with explanatory graphics, so that it is easily understood by Delta residents and agencies. The EIR's purpose should be to inform public discussion and agency decisions about alternative ways to achieve the project's objective, rather than just to compile an exhaustive and encyclopedic narrative about the project and its effects. Innovative communications, such as video clips, should supplement the written report.
729	Erik Vink Delta Protection Commission	Thank you for the opportunity to provide input. We are available to engage in multilateral discussion of how to protect and enhance the unique values of the Sacramento San Joaquin Delta.
733	Tom Williams	Provide Scoping Summary Report within 60 days of closing Scoping period and provide monthly online updating of the draft SSR.
735	Regina Cuellar Shingle Springs Band of Miwok Indians	I write, on behalf of the Shingle Springs Band of Miwok Indians (“Shingle Springs” or “Tribe”), to follow up on the Tribe’s numerous requests for a pause in all planning, design, and environmental review processes relating to the Delta Conveyance Project (“Project”). As you know, in light of the COVID-19 pandemic Governor Newsom has issued a State of Emergency and ordered Californians to shelter at home until further notice. Consistent with that order, the California Judicial Council has ordered a suspension of all civil law statutes of limitation, including deadlines applicable to the California Environmental Quality Act (“CEQA”). You may also be aware that Shingle Springs has ordered all employees, including those responsible for working on the Project, to refrain from in-person work and to limit their personal contacts until further notice. The Tribe’s government offices — and, in fact, the Shingle Springs Rancheria as a whole — are essentially closed down in order to curb the spread of COVID-19. Under these circumstances, we think it would be highly inappropriate to insist on maintaining existing deadlines relating to the Project’s Notice of Preparation (“NOP”) and scoping process. The Tribe is currently focusing its limited resources on immediate health and safety issues facing its citizens, and we expect to continue that focus until the emergency has passed.
735	Regina Cuellar Shingle Springs Band of Miwok Indians	DWR has previously expressed interest in developing a meaningful government-to-government relationship with tribal stakeholders, and we cannot imagine that you would ask us to choose between addressing the immediate health and safety needs of our citizens (on one hand) and providing input on a future project that threatens the environmental and cultural resources on which those citizens depend (on the other). While the Tribe will aim to respond to the NOP at the earliest reasonable opportunity, we do not expect to be in a position to do so until the end of this month (April 2020). We trust this will not materially impact the years-long schedule for environmental review of the Project, and we appreciate your understanding.

739	Ray Brant	As a home owner on Long Island, I am writing to ask that you delay the Delta Conveyance Project public process for at least 45 days. This process must be delayed until Delta communities can fully participate in these processes.
740	Ryan Hernandez Contra Costa County Water Agency	Contra Costa County agrees with the request by the Delta Counites Coalition ("DCC"), and others, to temporarily pause the processing of the Project as many of our County employees are now serving as Disaster Response Staff during the 2019 Novel Coronavirus incident.
741	Michelle Botor	I strongly suggest delaying these meetings until after the lockdown...This is not the time to be moving forward with agendas or meetings where the residents and their representatives cannot even have a say in it.
747	Jan McCleery Save the California Delta Alliance	I have requested via your Online Form that the comment period be extended. It is inappropriate to be asking for input from Delta folks impacted by the pandemic.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	It is requested that DWR post the lead and responsible agency responses on the project website as part of the public record and include them in the Scoping Report when it is made available to the public so that the public can be informed and comment upon identified agency needs and requirements from the Delta Conveyance Project.
754	William L. Martin	This entire scoping process should be suspended until the pandemic is under control and the Governor has removed his state of emergency. I am both shocked and saddened at your unconscionable decision to move forward at this time.
755	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	California has already failed in one key category: Not extending the time frame for public participation in the process, for a plan that IS NOT TIME CRITICAL, while the Country is in the midst of obvious pandemic crisis constraints on public participation. Sadly, this is also an early indicator that this process will, once again, be degraded by a ubiquitous, decades old, bias toward largely southern based water exporters.
757	Becky Donnelly	We are in a lock down and not changing the time period to comment is unbelievable this is a disaster for this state environmentally and economically
774	Don Hankins California Indian Water Commission	The California Indian Water Commission had sought to engage in this process via government to government engagement with the Department of Water Resources, but out communications with the Native American Liaison did not receive a reply. Apparently, DWR has opted to consult with AB 52 tribes and tribal organizations despite other policies which are more inclusive of consultation pursuant to HR 93-638, B-10-11, and other federal or state policies recognizing tribal self-determination and sovereignty. The limited approach to AB 52 consultation is problematic given the limitations of knowledge and input such narrow consultation may provide. Our organization and members are traditional cultural practitioners who have worked with or provided comments on prior environmental reviews related to the Delta and elsewhere, and should be utilized to develop a project and analysis that avoids and minimizes impacts to cultural and ecological systems directly, indirectly, and cumulatively with any proposed project.

774	Don Hankins California Indian Water Commission	A purpose of the California Environmental Quality Act is to provide a mechanism for public input on projects funded, authorized, or carried out by state and local agencies. Thus, to provide for meaningful input from the public, it is recommended the environmental document length be manageable for the general public to engage with. This was specifically and issue with the Water Fix project documents. One cannot be expected to read 30,000-100,000 pages of material to comprehend a project.
774	Don Hankins California Indian Water Commission	Furthermore, we strongly encourage further engagement as discussed to clarify points of uncertainty and to provide a more inclusive process for analysis.
789	Jeff Henderson Delta Stewardship Council	The Council notes that, on behalf of DWR, the Delta Conveyance Design and Construction Authority (DCDCA) is currently exploring alternative configurations of Project features described in the NOP as part of a public process with a Stakeholder Engagement Committee (SEC). The DCDCA also recently received and published input from an Independent Technical Panel (ITP) regarding, among other things, alternative tunnel alignments that do not correspond to those described in the NOP. Thus, additional details regarding potential Project components and alternatives not described in the NOP are publicly available and being publicly discussed. The Council looks forward to receiving and reviewing the scoping and alternatives report DWR intends to prepare following the NOP review period and reserves the right to offer additional public comments regarding applicable Delta Plan policies considering more detailed alternative alignments and configurations of Project features at that time.
789	Jeff Henderson Delta Stewardship Council	In a future certification of consistency, DWR should describe if and how it proposes to modify SWP water supply contracts and how such contracting was conducted in a transparent, public manner aligned with applicable DWR and Reclamation policies.
789	Jeff Henderson Delta Stewardship Council	As DWR proceeds with design, development, and environmental impact analysis of the Project, we invite you to continue to engage the Council in early consultation (prior to submittal of a Certification of Consistency) to discuss Project features and mitigation measures that would promote consistency with the Delta Plan. We also encourage DWR to continue to present Project updates at Council meetings.
789	Jeff Henderson Delta Stewardship Council	More information on covered actions, early consultation, and the certification process can be found on the Council website at https://coveredactions.deltacouncil.ca.gov/. Council staff are available to discuss issues outlined in this letter as you proceed in the next stages the Project.
792	Sarah Salisbury	I attended the ONLY scoping meeting regarding the Delta Conveyance Project held in northern California. This in itself is objectionable. How can it be possible for you decisionmakers to get the full scope of responses from those who live where the water comes from when you schedule just one meeting there? I understand that there were several such meetings south of the delta, where the recipients of the water, of course, think it's a lovely plan. Up here, not so much.

800	Joshua Grover California Department of Fish and Wildlife	Based on the potential for the Project to have significant impact on biological resources, CDFW concludes that an Environmental Impact Report (EIR) is appropriate for the Project. CDFW looks forward to ongoing discussions with DWR staff during the development of DWR's EIR and anticipated ITP application for take of State listed, candidate, rare, sensitive, and special-status species associated with construction and operations of the Project, and lake or streambed alteration notification.
810	Colin Brodie	It is very difficult to believe that you would continue to request comments, let along going ahead with the tunnel project, during this pandemic. Yes, I live on Delta and greatly impacted, as our many of my friends and neighbors, by this horrible project are battling a plethora of problems like worrying about our finances and how to safely buy groceries (being older and in the high-risk category). Apparently your focus is very self-serving and has little or no feeling about those trying to get through this crisis. This project will simply further impact my community's economy and way of life.
813	Chris Donnelly	Millions of Americans, especially Californians are scared for their lives as well as their jobs and you are holding hearings and meetings that will affect Californians economically for generations to come. You may have no problem spending our money and destroying California's ecosystem for almonds and other water intensive crops, but I do not and I know I'm not alone. Please grow a conscience and do the right thing and stop this now. Help California recover if we ever can from the COVID 19 and stop worrying about the almond farmers.
815	Gavin McCreary California Department of Toxic Substances Control	DTSC appreciates the opportunity to review the NOP. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: https://dtsc.ca.gov/wp- content/uploads/sites/31/2018/09NCP App-1460 .doc. Additional information regarding voluntary agreements with DTSC can be found at: https://dtsc.ca.gov/brownfields/.
826	Melinda Terry North Delta Water Agency	The Proposed Project is extremely large, with a long-term construction timeline, and hundreds of potential adverse impacts during construction and operation of the new conveyance facilities . We encourage DWR to organize the EIR in a way to allow the true nature, extent, and scope of these environmental impacts to be discernible to the general public and permit decision-makers.

829	Sherri Norris California Indian Environmental Alliance	Repeatedly, over multiple decades, Tribes and communities have stated that we do not want this project. Those sentiments in opposition have been voiced from those who live adjacent to the source rivers and tributaries that feed the Sacramento River, those in the footprint areas of the numerous associated project sites, and from those in the receiving waters areas of the Sacramento River, through into the San Francisco Bay. We stand with those in opposition to the project and feel that our voices have been ignored. It is our understanding that during the scoping period for the Water Resiliency Plan and for the Delta Conveyance Project that the state and DWR did not receive support for this project from communities or Tribes. Also, we understand that the public and Tribal meetings have been informational, providing only options for the Project to proceed without including an option of to discuss a 'no Action Alternative' or solutions that are more innovative than are diversions, conveyance and storage. We can see language embedded in staff statements, preparatory documents and meeting minutes that indicate that the decision to move forward on the Delta Conveyance Project or some version of it was already been made before comments had been received from the pubic and from Tribes who will be impacted by the construction and then by the operation of the conveyance system. It is alarming that the state has decided that this Project must move forward regardless of the public will and regardless of what Tribes in the Source, receiving and footprint area preparation of an Environmental Impact Report (EIR) for the Delta Conveyance Project in the Sacramento-San Joaquin Delta, California. If the goal of this project is to benefit the citizens of the state of California, why is the state ignoring the voices of those communities and the California Tribes who will be impacted? This is contrary to public trust doctrine and is indifferent to the Will of the People. We understand that the state is operating with the goal of securing the delivery of water to Santa Clarita, San Bernardino, San Gorgonio and other counties outside of our region, however there are likely other ways to arrive at the same outcome and the public deserves to have those options researched and considered thoroughly.

829	Sherri Norris California Indian Environmental Alliance	The scope and scale of the Project to the Central Valley and to Northern California have not been fully disclosed for evaluation by the public and by Tribes Upon review of the proposed Project it is clear that the scope of this project is much larger than how it was portrayed as merely one tunnel. Per the Notice of Preparation and in the Delta Conveyance Design and Construction Authority Board of Directors materials from the April 13, 2020 meeting there will be in fact two main intakes, that join into one tunnels and hundreds of supporting sites and features. The massive scale of this project and the hundreds of acres of lands that will be impacted seems excessive and we have not heard that the public is aware of the size and scale of this project. There are no protections that the infrastructure will be operated in a way that does not remove more water than the system can handle. Experiences resulting in fish kills during the Bush Administration, and threats from our current administration exemplify that this concern is real. Future administrations can require water diversions, choosing between stakeholders. While there are not protections it is irresponsible to create an infrastructure that could destroy the Bay Delta and Sacramento River aquatic system. The public and California Tribes should be made aware of what this project truly entails and what risks this system may create. We assert that this has not been sufficiently disclosed to stakeholders in the region. The amount of land required to complete this project is much larger than previously understood publically. For example, the maintenance shafts are some of the smaller features of the Project infrastructure, and the Plan states that each will require 10 acres of construction area, and these will be placed every five miles along the path of the Project infrastructure. It does not seem that the risk is worth the outcome when we balance the amount of land and aquatic resources that will be sacrificed to bring water unsustainably to an area already de-watered. This is especially true when we consider again that all alternatives will not be reviewed under the EIS that DWR plans to prepare.

829	Sherri Norris California Indian Environmental Alliance	Development of EIR Project & Environmental Mitigation reports During the Water Fix, state agencies and their contractors did not share environmental mitigation plans with the public or with tribes as part of the EIR process. Instead they chose to bifurcate these processes on separate tracks with non-aligned timelines. This resulted in an inability to properly review whether or not the plan was feasible or desired by the public. As a general recommendation to the Delta Conveyance Project or any other project that the state embarks upon, we strongly recommend that these two documents be created and deliberated on in tandem. We cannot evaluate that the goals of a project will meet multiple needs if we are unable to review to potential effects and solutions simultaneously. In the DCA April 2020 Report the program schedule stated that the engineering team will speeding up their work. It is our understanding the engineering studies are moving forward and that per the Executive Summary that the DCA April 2020 Monthly Board Report, "team has ramped up staff and anticipates continuing to gain time back in the coming two months." The list of upcoming task schedule in this report is extensive, and by reviewing this list we cannot see how environmental mitigation plans will align with this schedule.

829	Sherri Norris California Indian Environmental Alliance	Project development, implementation, Timing and Convid-19 As stated above it is unclear if this project is the best solution for California since all alternatives have not been fully explored and because we are in the beginning of a the Covid-19 pandemic. Families, including experts that should have the time to review the Delta Conveyance Project plan are struggling to protect the health of their loved ones. We have not hit the peak of this pandemic and we do not know how long it will be with us. This is not the time to expend tax payer's money on a Delta Conveyance Project. While we are being impacted by the COVID – 19 pandemics the public review process and Tribal consultation cannot continue meaningfully. We are in a resulting fiscal crises that will require a re-evaluation of our annual budget for the state and this should also include an evaluation of the budget for the Delta Conveyance Project. We do not yet know the scope of how this pandemic will affect the economy of the state and because of this it is premature to assume that our state will have the funding available to continue to embark on such a costly and ambitious infrastructure project. The cost of this project is enormous. For example, in the recent DCA Board of Directors materials it was the financial report provided that the Delta Conveyance Design and Construction Joint Powers Authority has expended $23,018,268 since July 19, 2020 and from that "certain expenses through September 2019 were reclassified to construction in progress," so the amount of funds expended and to be expended is even higher than that amount. Why we are expending such large amounts of funds before public scoping has been completed, and before we know our financial situation. We respectfully recommend that DWR does not embark on the development of the EIS report at this time. We ask that you take these above items into consideration, that this project and related spending cease until the need for the project is evaluated, until Tribes and the public can weigh in on the alternatives, and until we re-evaluate the current budget in light of the coved-19 crises, and that the state work more closely with Tribes throughout the watershed to create a sustainable plan for California that has less of a detrimental impact on both the environment and on the California Tribes and Native American people.

830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	THE EIR SHOULD INCLUDE CULTURAL AND COMMUNITY VALUES AND NEEDS FOR NORTHERN CALIFORNIANS. ENGAGEMENT OF TRIBES AND DISADVANTAGED COMMUNITIES IN NORTHERN CALIFORNIA HAS BEEN INSUFFICIENT The State of California, through law, legislation and funding sources has prioritized tribal and disadvantaged communities throughout the state. According to the Upper Sacramento IRWM Plan, the entire region qualifies as a disadvantaged community (DAC) under DWR guidelines. However, the communities and cultural resources in the MLH have continued to struggle for protection of sacred waters. The State has a responsibility to partner with tribal communities. California tribes and tribal communities, whether federally recognized or not, have distinct cultural, spiritual, environmental, economic, and public health interests and valuable traditional cultural knowledge about California resources. According to your own policy, "DWR is committed to open, inclusive, and regular communication with tribal governments and communities to recognize and understand their needs and interests." The Medicine Lake Highlands have also been identified as being sacred to the Pit River, Klamath, Modoc, Shasta, Karuk and Wintu tribes. By not taking action to support the need to fill critical groundwater data gaps and to protect the sacred waters in the Medicine Lake Highlands, the state is doing the tribal communities and state-designated DACs a disservice. DWR recognizes that California tribes and tribal communities, whether federally recognized or not, have distinct cultural, spiritual, environmental, economic, and public health interests and valuable traditional cultural knowledge about California resources. Through their tribal policy, DWR aims to support collaboration and informed decisionmaking with tribal communities, with a specific focus on: Working to restore, protect, and manage the State's natural resources for current and future generations; Using creative approaches and solutions based on science and tribal ecological knowledge; Developing strategies for preserving California Native American tribes' water rights and providing for the sustainable management of California's sacred waters; Demonstrating a respect for all communities, resources, and interests and an open and free exchange of information. Lastly, DWR should include northern California tribal and DAC representation on the Delta Conveyance Design and Construction Authority.
830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	Thank you for your consideration of our input. We speak for many in our region who have made their views known to us, for the communities downstream who benefit from our immense pristine water sources, for the wildlife and aquatic species to whom we lend our voice, and for future generations that will benefit from the drought resilience our region provides.
854	Isaac Kinney	Extend the comment period because of the Covid-19 pandemic or suspend planning/permitting for the project.

855	Josephine Sambado	Hi my name is Josephine Sambado and I'm calling because I think all the meetings and all the decisions about the Delta need to be delayed. I think the virus has put us all in a position that a decision as enormous as the Delta tunnels should be postponed and meetings for the Delta tunnel should be postponed, committee meetings, all of that should be postponed. This is something we should put in the future when the public can express itself properly and be able to attend different functions in regards to the tunnels. I would appreciate please that we put everything on hold and discuss it sometime in the future when the public is truly able to participate. My phone number is 209-609-6149. My email is jllsam@comcast.net. Thank you.
861	Clark Freitas	Good morning my name is Clark Freitas and my email address is imcaf@cs.com. With this Corona virus going on and everything up in the air, jobs and everybody staying in the house, you know I really feel as though Governor Newsome really should give that 45 days that the Restore the Delta is asking for. Otherwise people aren't gonna show and it's gonna seem like no one cares and that's really not the truth, and I own several properties literally along the water, maybe look up my name and you can find me in Contra Costa County and this whole Delta tunnel thing, I've tried to stay out of it, but it's really it's really gonna take a toll on the Delta, the wildlife the boating and fishing, I mean I can go on and on. Anyways I only have five minutes so I wish they'd reconsider you folks would reconsider and give that 45 days for comment but I appreciate it. Thank you.
865	Phyllis Bala	The lack of consultation with Native tribes and communities from the Klamath-Trinity to the Sacramento watersheds – whose livelihoods and lifeways will be negatively impacted by the increased removal of water from those sources.
865	Phyllis Bala	— The lack of consultation with Delta area tribes, whose traditional villages and burials will be violated by tunnel construction.
873	Barbara Chapman	Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?
878	Richard Solomon	In the midst of the coronavirus situation here in Calif please postpone any hearings about the Delta tunnel project. People are far too engrossed in trying to protect their health and that of their loved ones to engage in any other issues like this one right now. It will be an injustice if you proceed with this project at this time.
879	Inder Preet Singh Caltrans District 4	The Delta Conveyance Project involves encroachments within multiple Caltrans Districts. Have other Caltrans districts such as District 10 been notified of this project?
880	Muriel Strand	Have all stakeholders been able to realistically access all relevant information and have all had adequate opportunity to comment?

881	Stephen Rosenblum	Water has been and will continue to be an important resource for our state. Next to breathable air it is the next most important resource for maintaining life. Whenever we make decisions regarding the allocation of water, we must take the time and effort necessary to come to the best decisions regarding its best uses to provide the most benefit to all. There is no need to rush to judgment as the results of these decisions will remain with us for many decades if not centuries. In this dangerous time of the COVID19 pandemic, many Californians will not have a proper way to have input into this important decision. Among them are those impacted by the digital divide; essential workers; environmental justice communities; Northern California tribes; people caring for the sick; those struggling financially. I urge you to postpone the deadline for public input until such time as the pandemic crisis has passed.
885	Claudia Mackey Restore the Delta	Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?
886	Barbara Steinberg	This process should be stopped - now and into the future. But for the now, until communities and those impacted have time to respond. During this Covid-19 crisis it is incomprehensible that this process has continued. I have attended more than one meeting/hearing. Despite community response, you/the State persist. Now is not the time. You cannot have a full impact report if those impacted are unable to provide input.
887	Scott Mondloch	Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?
901	Michael Davis	Also this is crazy and should be illegal that you can try to move forward with this when we all have shelter in place.
903	Edward Stetson	The fact that you continue to pursue this boondoggle through the COVID-19 shutdown is proof that you intend to ram the scoping process through as little public comment as possible. SHAME ON YOU LACKEYS OF BIG AG!
907	Linda Hall	Finally it is irresponsible to hold public meetings at this time of a national emergency.

914	Jan McCleery Save the California Delta Alliance, Discovery Bay	Various organizations representing Delta citizens, including STCDA President Karen Mann, have sent formal requests to DCA and DWR to postpone all tunnel-related activity until after the pandemic crisis is over. In particular, anything requiring Delta Stakeholder feedback is inappropriate to require during this pandemic. I would like to also request the NOP Scoping comment period be extended to at least 45 days after Governor Newsom's emergency order is fully lifted and we can once again hold large meetings to gather feedback. Many of us attended the February NOP Scoping meeting in Brentwood and the room was over-flowing. DWR provided little detail; but they received a great many comments. On March 11, a significant amount of detailed information was presented to the SEC by the DCA. Save the California Delta Alliance has worked over the years to be ensure the Delta community is informed about the current status of projects that will affect the Delta and strive to collect their feedback and concerns. When new information is released, it is typical for us to hold a Town Hall in the Discovery Bay Elementary Gymnasium where we present the latest information and hear from our legislators. Typically we have our County Supervisor and CA Assemblyperson speak and others such as our CA Senator and representatives of US legislators. But we have been unable to hold a Town Hall or group meeting to enable discussions and question/answer sessions during this pandemic. Typically we can do that before major comment periods, or at least get the information out to Delta folks. It is even difficult to even ask for people's attention on emails or material distributed during this crisis because folks are too focused on more important topics: home schooling, keeping their businesses afloat, financial worries, safety concerns for essential workers in their family, and concerns for elderly or ailing relatives. This leaves the Delta folks that will be the most negatively impacted by this project without adequate information to respond, even if they had the bandwidth at this time. There was huge response (negative) about the WaterFix project over many past years, and that project was finally remanded to DWR in 2018 and then withdrawn by DWR in 2019. Disappointingly, this "new" project has the same significant impacts. The tunnel is years in the future, if it is ever even built. There is no need to forge ahead during a crisis. We, in the Delta, say the "No Tunnel" alternative is the right answer - coupled with Newsom's Portfolio of better technologies and approaches: Groundwater recharge, desalination, recycling, and good old conservation (e.g., replacing L.A. lawns with desert landscaping). Once again, please delay this comment period until 45 days after restrictions about meetings have been lifted and the world is back to somewhat normal for everyday citizens.
924	(Anonymous)	Please postpone tunnel meetings and comment periods in order to get proper public comment. Trying to push this through while citizens are prevented from protesting is shameful governance.
925	Riadh Khairalla	Please postpone the public meeting and comment period. I am very much opposed to the tunnel project as in its current form it will severely impact my Delta property. The shelter in place directive makes it impossible for me to attend the public meeting and to state my opposition to the current plan. Again, given the current circumstances under COVID-19 shelter in place please postpone the meeting and extend the comment period.

930	Barbara Worden	Please delay this decision until after the Coronavirus Pandemic to allow for public comment on this new tunnel that will be our new neighbor. It is unfair to push it thru at this time. Extend the deadline to allow us a more fair response. I have lived in Discovery Bay for 30 years, built our home on the water, a deeply oppose a move to build a tunnel.
932	Don Person	No decision should be made on the tunnel water project at this time. The EIR is incomplete and more public input is necessary.
933	Charles Robinson	I ask that you consider the following issues when creating the EIR for the Delta Conveyance Project: * Include a clear plan for community consultation, including the responsible parties. A project such as this, stretches over a the large geographic area and wide range of affected communities, both human and natural. It traverses borders where the rules are different, and there are competing interests in the project at a high level. The effected groups differ in their way of life, their cultural norms, communication preferences, and vulnerability to change. A "one size fits all" approach to communication and outreach will fail, as it does not acknowledge the differences in the community characters and needs and their decision-making processes.
936	Sally Sturney	PLEASE delay any Tunnel meetings requiring Delta stakeholder feedback until at least 45 days after pandemic emergency ends so we have time to hold a Town Meeting to inform residents about a new Single Tunnel plan and get their feedback.
937	Tracey Ziomek	I live and breath the Delta, enjoying the natural beauty, wildlife, fishing, swimming and boating. I bring life to the Delta, while the Delta is, unbeknownst to most, being sucked dry of life. Now that there is a proposal for one tunnel, I am hopeful, even during this COVID-19 pandemic, that the Board will take the needed time to issue a letter that instructs the state and federal project operators to prepare a Comprehensive Operations Plan and Monitoring Special Studies (COP/MSS) report that addresses the spirit, not just the letter, of the 2018 Bay-Delta Plan's Program of Implementation. I work in clinical trials, and as we work toward a vaccine for COVID-19, we in clinical research are all taking a step back to make major changes in the way research is done, so we can improve the safety and well being of the patients. I would ask that the Board do the same, and consider what can be done now to put the brakes on this project to ensure the environmental safety and well-being of all of CA, not just those who own the water rights.
939	Marion McKnigjt	Extend date
941	Galen Dobbins California State Assembly	Please postpone any decision on the tunnel project until after CA has finished dealing with the Covid-19 situation and people once again have the full opportunity to voice their disagreements with it.
942	Rene McCarter	Please extend the Delta Conveyance Project feedback time until the Virus Pandemic safe period has been declared. This project will be extremely detrimental to the residents of Discovery Bay. We deserve an extension at this critical time. The impact of the single tunnel plan has been put on hold for most Discovery Bay residents due to health and economic concerns with the pandemic. More time is obviously needed to study the issues that the single tunnel! creates for us all.

944	Susan Ludwig	The meetings should be put on hold like the rest of our lives at this time, due to social distancing and health and safety issues involved. Don't try to push it through while people are trying to stay alive and keep their families safe. No meetings of this type should be scheduled until the entire country is open again.
951	David Moen	No town meetings to discuss this have been allowed for over 30 days. It's unconscionable & probably challengeable in court that you would go ahead with closing the comment period during the pandemic. It should be delayed until the pandemic has passed & time has been given to hold said meetings.
977	Karen Wilson	The DCP EIR Project should be put on hold until pandemic levels are safe.
996	Shari McCracken Butte County	There are no scheduled scoping meetings north of Sacramento. Draft environmental assessments of previous projects (BDCP, WaterFix) demonstrated the project would have significant impacts to Butte County and northern Sacramento Valley. Given the significant impact, interest and controversy of the DCP, the Butte County Board of Supervisors directed me to request that DWR schedule additional scoping meetings in Butte County and other locations in the northern Sacramento Valley.
1005	Stacy Sebring	The DWR must extend the scoping period, since their "scope" has been so narrow (not even one meeting in San Francisco). DWR must have more meetings up north where the source water is.

Table D-3. Comments Regarding the Project Objectives, Purpose, and Need

Letter	Commenter Name, Affiliation	Comment Text
1	Dee Joyce	We do not need any more “conveyance” of precious fresh water from the Delta to those who do not appreciate the Delta environment. We need for those without to be more conservative, find alternatives to their lifestyles, stop wasting a precious commodity on useless vast lawns in their southern deserts. When the Delta is gone, it will be gone for good.
12	Diane Kirkham	Overtly state within the NOP a policy preference to utilize public properties for tunnel alignments where possible. If the state chooses to ignore the many reasons not to select the Eastern Corridor, DWR should make every effort too utilize a pathway within the preferred Corridor that lessens the impact on productive agricultural lands and utilizes public properties where possible. For example, just north of the Mokelumne River there are both public properties and private properties within the designated Eastern Corridor. It seems particularly sensible to route any proposed tunnel through the public properties owned by DWR (specifically Sacramento County APN# 146-0120-016, APN# 146-0120-015 and APN# 146-0120-020) and avoid the private property in productive agriculture which has been owned by my family for generations.
29	Hope Salzer	I am opposed to wastefully spending taxpayer money to supply water at high public cost to prop-up property values and real estate developments and investments in Southern California and further subsidize Central Valley agribusinesses while damaging unique natural habitats, stealing water from local communities with their own economic development and water needs and further endangering endemic species and ecosystems.
57	Paul Cook Irvine Ranch Water District	…modernizing Delta conveyance to improve imported water supply reliability is important to the District. IRWD supports the project objectives stated in the January 15,2020 Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project. The District agrees that new Delta conveyance is "necessary to restore and protect the reliability State Water Project (SWP) deliveries" on which two-thirds of California’s population of nearly 40 million relies. Climate change and predicted sea level rise necessitate action on improving Delta conveyance, and there is a real risk that the existing Delta conveyance infrastructure could not adequately maintain operation in the event of a major earthquake that compromised Delta levies. The proposed project would protect the reliability of SWP deliveries by allowing adequate water capture during high-flow events without threatening the Delta's aquatic life. A reliable and high quality imported water supply is a vital component of the District's and Southern California's water resources portfolio. Modernizing Delta conveyance is essential to ensuring a sustainable water supply for millions of Californians and the protection of the Delta as a unique natural asset.

58	Nina Jazmadarin Foothill Municipal Water District	The need for this project remains greater than ever. Even as Southern California continues to diversify its overall water portfolio by developing local supplies and lowering demand, high-quality supplies from Northern California will remain a vital foundation of our water management strategy. This supply makes viable new initiatives such as recycling. Imported supplies will be our vital reserves to withstand dry cycles which may be longer and more severe than recent history.
83	James Marsh Friends of the Calaveras River	I believe the potential negative environmental impacts of all the various "conveyance" proposals made in this regard in recent times--starting with the Peripheral Canal scheme and ending here-have been exhaustively discussed. I believe those negative impacts (and a whole lot more we haven't the means to anticipate currently) will, in fact, come to pass should any further diversions of Delta waters be engineered.
83	James Marsh Friends of the Calaveras River	What I've heard far too little about is that uniquely 21stcentury understanding much of sane humankind has come to acknowledge and embrace: that all our resources are indeed finite. And, further, that the real and sustainable 21st century solutions to our resource dilemmas will not appear as 18th century, dawn of the Industrial Age thinking dressed up as a modern mega-engineering schemes. [Attachment includes addition comments regarding finite resources and resource distribution. Those comments are already captured.]
85	Luis Portillo Inland Empire Economic Partnership	This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important.
87	Jaclyn Shaw	(6) OWENS VALLEY, AGAIN, now Mono Lake promotes rivers, tributaries. See the calendar photos for Mono Lake with losses to Los Angeles.
97	Thomas Love Upper San Gabriel Valley Municipal Water District	The need for this project remains greater than ever. Even as Southern California continues to diversity its overall water portfolio by developing local supplies and lowering demand, high quality supplies from Northern California will remain a vital foundation of our water management strategy. This supply makes viable new initiatives such as recycling. Imported supplies will be our vital reserves to withstand dry cycles which may be longer and more severe than recent history. For the San Gabriel Valley, this is especially critical as our groundwater basin is dependent on 20% of imported water from the Delta for groundwater replenishment. During the 2014 Drought, our groundwater basin dropped to a historic low and with below average local rainfall, the Basin is slowly recovering. Imported water has been critical to maintain the sustainability of the Basin and meet the local water needs of the region.
103	Harry Mash	I AM A 70 YEAR RESIDENT OF SOUTHERN CAL. AND ASK THAT YOU PLEASE, PLEASE, PLEASE MOVE THIS PROJECT ALONG. THIS WORK SHOULD HAVE BEEN COMPLETED MANY YEARS AGO. DO YOUR BEST TO EXPEDITE THE PROCESS.

117	Robert Pyke	Comment letter states that attached material provides information on an alternative solution usually referred to as the Western Delta Intakes Concept (WDIC). The comment letter notes that the WDIC was briefly considered as an alternative in the BDCP EIR/EIS but that it was incorrectly characterized and thus not given serious consideration. The comment letter also includes comments previously provided on the 2013 Draft BDCP EIR/EIS related to the purposes and need.

117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] The content of the Plan and the EIR/EIS is inconsistent with the stated objectives, purpose and need. While these are comments on the EIR/EIS, not on the Plan itself, the "project" that is described in both the Plan and the EIR/EIS, has not been demonstrated in the EIR/EIS to achieve the stated objectives, purpose and need. In Section 2.3, Projective Objectives, (under CEQA) it is stated: DWR's fundamental purpose in proposing the BDCP is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south-of-Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations. This statement of purpose is followed by three project objectives: · Respond to the applications for incidental take permits take related to: 1. The operation of existing SWP Delta facilities and construction and operation of facilities for the movement of water entering the Delta from the Sacramento Valley watershed to the existing State Water Project (SWP) and Central Valley Project (CVP) pumping plants located in the southern Delta; 2. The implementation of any conservation actions that have the potential to result in take of species that are or may become listed under the ESA, pursuant to the ESA at §10(a)(1)(B) 10 and its implementing regulations and policies; (3. is no longer applicable.) To improve the ecosystem of the Delta by: 1. Providing for the conservation and management of covered species through actions within the BDCP Planning Area that will contribute to the recovery of the species; and 2. Protecting, restoring, and enhancing certain aquatic, riparian, and associated terrestrial natural communities and ecosystems. 3. Reducing the adverse effects to certain listed species of diverting water by relocating the intakes of the SWP and CVP; · Restore and protect the ability of the SWP and CVP to deliver up to full contract amounts, when hydrologic conditions result in the availability of sufficient water, consistent with the requirements of State and federal law and the terms and conditions of water delivery contracts and other existing applicable agreements. And by five "additional project objectives" which include: To make physical improvements to the conveyance system that will minimize the potential for public health and safety impacts resulting from a major earthquake that causes breaching of Delta levees and the inundation of brackish water into the areas in which the SWP and CVP pumping plants operate in the southern Delta. The three project objectives that are cited above are not met on the basis of the voluminous material presented in the Plan and the EIR. In particular, it seems unlikely that the first objective, which has to do with the granting of incidental take permits, will be met in view of the failure to date to produce an effects analysis that convincingly shows that all listed species will be lifted far above jeopardy with the potential for them to be delisted. The most recent peer review panel assembled by the Delta Science Program at the request of the BDCP1 concluded that the current effects analysis is incomplete and inconsistent and an independent review conducted for The Nature Conservancy and American Rivers reached similar conclusions2. The additional project objective that is cited above is in fact a red herring, as will be discussed in more detail subsequently, but the notion that an undefined major earthquake could cause widespread breaches of Delta levees appears to rely largely on the Delta Risk Management Strategy, whose conclusions were also discredited by another peer review panel assembled by the Delta Science Program. To the extent that there is any risk to the

Delta Levee System posed by earthquakes, this can be addressed more effectively and more cheaply by implementing the recommendations of the Economic Sustainability Plan of the Delta Protection Commission3. As noted below, this is just one of the actions that are likely to occur in the Delta within the next 50 years independent of the BDCP that should have been described and discussed in the No Action Alternative.

117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] Section 2.5.3, Delta Hydrology and Water Quality, is remarkable for defining a need that the Plan does not address which includes both salinity intrusion and : Additionally, other water constituents of concern in the Delta have been identified through ongoing regulatory, monitoring, and environmental planning processes such as CALFED, planning functions of the State Water Board, and the Clean Water Act Section 303(d) list of state water bodies that do not meet applicable water quality standards. In June 2007 (with updates in February and May 2009), the U.S. Environmental Protection Agency gave final approval of a list of 18 chemical constituents identified in the Section 303(d) list for impaired Delta waters (State Water Resources Control Board 2007). Included in this list are dichlorodiphenyltrichloroethane (DDT) and other pesticides, mercury, polychlorinated biphenyls (PCBs), and selenium. Although there is a clear need for addressing in-Delta water quality issues, none of the alternatives considered except Alternative 9 are geared to address these issues and the CEQA preferred alternative, Alternative 4 in conjunction with Operational Scenario H, actually improves export water quality at the expense of Delta water quality! BDCP staff and consultants have admitted that it is not possible to address the projected decline in Delta water quality while sticking with this preferred alternative! That the preferred alternative does not address a stated need, but in fact aggravates the situation, is not only indefensible but laughable. In summary, the principal objectives, purpose and need that are detailed for purposes of compliance with CEQA and NEPA are not met by the preferred alternative, or any other alternative that is described in the Plan or the EIR. There is no convincing evidence of any overall improvement in the Delta ecosystem - there may be marginal improvement in expectations for Delta smelt but expectations for salmon are made more problematic – and there is no expectation that the SWP and the CVP will deliver up to full contract amounts under any hydrological condition – the interpretation of the results buried in the EIR/EIS by the BDCP staff is that exports will be maintained at present levels, plus or minus 10 percent, except that exports may have to be reduced if species recovery goals are not met, a circumstance that appears to have a high probability of occurrence. In fact, even the projection of maintaining exports at something like present levels is a fiction. Figures 1 and 2, kindly provided by Richard Denton, show that in order to achieve this overall level of exports, it is necessary to resort to more pumping in drier months than is the case at present. It is not easy to trace the effects of this through the present effects analysis, but this might be one of the reasons that the effects analysis does not show sufficiently positive results to justify the granting of incidental take permits. If the operational rules were to be changed so that the effects analysis suggests more positive results for salmonids, the volume of exports would immediately be reduced. These figures also show that it is ludicrous for BDCP proponents to talk about taking a “little sip, big gulp approach”, that is to take more water at periods of high flows and little of no water at periods of low flows. The BDCP does not in fact include the necessary physical components to do that. It should also be noted that it is unclear whether the aqueducts can presently carry the combined maximum exports of 14,400 cfs shown in Figures 1 and 2 because of subsidence caused by excessive pumping of groundwater, so that it is doubly questionable whether the planned level of exports can actually be achieved. There are two reasons why the present Plan and EIR/EIS cannot be consistent with the

		stated objectives, purpose and need. One is that a "project" defined by its sponsors as being contained wholly within the Sacramento San Joaquin Delta (the Delta), cannot possibly solve the present conveyance and storage problems that limit water supply quantity and reliability to areas south of the Delta, nor can a "project" or "plan" that consists solely of actions within the Delta restore the ecosystem of what is inescapably a linked Rivers-Delta- Bay ecosystem of which the Bay-Delta estuary is an important component. Another is that a project that is basically a grab for the better quality water in the North Delta, that further reduces the flows through the Delta, cannot possibly reverse the conversion of the Delta from an estuary to a weedy lake nor make any significant progress on restoring the ability of the SWP and the CVP to deliver full contract amounts, even when there are favorable hydrological conditions.
117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] What then is required to address the stated objectives, purpose and need? Consideration of the water supply reliability question has to start with recognition that not only does two-thirds of the precipitation in California fall in the northern half of the State while two-thirds of the population live in the southern half of the State, but also with recognition that in California precipitation is not evenly distributed over time but tends to come in bunches of wetter than normal years and then bunches of drier than normal years (droughts), as may be seen in Figure 3. This is just as important as the geographical distribution of precipitation. It may be noted in Figure 3 that earlier last century a decent amount of water passed out of the Delta to the Bay and the Ocean even in dry years (the green bars). But now in periods of drought very little water passes through the Bay to the Ocean. While there are other stressors on the Bay Delta ecosystem, it is inescapable that the lack of Delta outflow in dry years coupled with the cross flow within the Delta that leads to millions of fish being captured and subsequently dying in the fish salvage facilities associated with the South Delta pumps, has had a major adverse impact on both the Bay Delta ecosystem and the viability of salmon runs that have existed for 7,000 years or so through mediaeval warm periods and the Little Ice Age but are now threatened with extinction. These basic facts lead to two fundamental principles: That natural flows through the Delta should be restored to the maximum practical extent, both in terms of quantity and the pattern of flow; 2. That much less, or zero, water should be extracted at periods of low flows, and that greater amounts of the water available during periods of higher flow that is surplus to the needs of Northern California users and the Delta ecosystem can be extracted for export.

117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] Preliminary calculations of the annual and average yields, of the kind that have not been made as part of the development of the Plan or the EIR/EIS, suggest that with the necessary plumbing in place to allow export of much greater amounts of water in periods of high flow, with the surplus over current needs South of the Delta being stored, primarily as groundwater, that average deliveries could not only be maintained at present levels but that they could be readily maintained through a three year drought and possibly through a six-year drought. That would constitute real water supply reliability, not false hope of water supply reliability. A project complying with these two principles might require some re-operation of the existing reservoirs and definitely would require that additional South of Delta storage facilities be constructed by the recipients of the exported water, but the principal facilities would all be in the Delta as is the case with the BDCP. The current "project" complies with neither of these principles and therefore cannot possibly meet the stated objectives, purpose and need. No amount of phony effects analyses or archaic water balance and water quality analyses can show that it does! If the "project" were to redefined as a project whose principal purpose is to provide better water quality for SWP and CVP Contractors at the expense of in-Delta water quality, then the current findings of the EIR/EIS would be consistent with the objectives, purpose and need, but the current findings are not consistent with the currently stated objectives, purpose and need and, moreover, the public draft EIR/EIS is just as incomplete and inconsistent as the existing effects analysis. In summary, the current public draft of the EIR/EIS does not describe a preferred alternative, or indeed, any alternative, that meets the stated objectives, purpose and need. Either a preferred alternative that will actually meet the stated objectives, purpose and need must be described and analyzed or the stated objectives, purpose and need must be changed and in either case a new draft EIR/EIS must be released for public review and comment.
117	Robert Pyke	[Attachment 3: Appendix B Comments on BDCP Public Draft EIR/EIS Regarding Ignoring the Economic Sustainability Plan, Misstating the Facts on Earthquakes and levees and the Irrational Content of Chapters 9 and 10.] The attachment provides detailed criticisms of the purpose and need for not including mention of earthquakes as well as critique that multiple chapters in the document should include more information regarding seismic risk.
119	Mary Leslie Los Angeles Business Council	Water is a vital resource for Los Angeles and its businesses. With approximately thirty percent of Southern California's tap water sourced from Northern California's Sacramento-San Joaquin Delta, our membership is dependent on the aging 1,100-mile levee system, which is vulnerable to disruption. The current system not only threatens the water supply, but it also endangers the environment and increases the risk of high-cost emergency spending.

119	Mary Leslie Los Angeles Business Council	The LABC supports the Delta Conveyance's goal of providing a safe and reliable water supply for Southern California, while also maintaining environmental quality and fiscal responsibility. By modernizing water delivery from the Sacramento-San Joaquin Delta to Southern California through a single delta tunnel, the Delta Conveyance project would provide reliable and environmentally-sustainable access to clean water for 19 million Californians. For these reasons, the LABC supports the Delta Conveyance project as a key way to ensure the growth and vitality of the Southern California region. Thank you for your leadership in creating a California for all.
129	Californians for Water Security	Failure to act on this project will result in a less secure water future for residents and businesses, the cost of water deliveries could increase, and the health of the Delta will continue to deteriorate.
129	Californians for Water Security	More than 27 million Californians rely on outdated infrastructure to deliver water from the Sierra Nevada Mountains through the Sacramento-San Joaquin Delta to homes, farms, and businesses throughout the state. This aging water distribution system is vulnerable to the threats posed by climate change and natural disasters. For far too long, we have failed to address these pressing issues, the status quo is no longer acceptable. Without action, water supplies through our main distribution system are at risk of collapse in the event of a major earthquake or flood. Breaches to our current dirt levee system could disrupt water supplies for up to one year for millions of Californians. This system is unprepared to deal with our state's changing hydrology. Scientists agree snowpack is becoming less abundant and less predictable due to climate change. With an improved conveyance system, California will be better prepared to handle the challenges associated with prolonged droughts and more intense storm systems driven by climate change.
129	Californians for Water Security	The proposed Delta Conveyance Project, a key component of the administration's statewide water reliability portfolio, will address many of California's complex water challenges. This project would: Protect water security for two-thirds of the state; Improve the reliability and security of our water system; Protect water supplies from earthquakes, floods, and natural disasters; Prepare for the impacts of climate change; Promote more natural water flows; Serve as a critical component of a comprehensive water portfolio
129	Californians for Water Security	Moving forward to modernize our water infrastructure is vital to protect our quality of life and our economy. Without this project, California's economic growth could slow, water rates could rise as we're forced to purchase water from less affordable sources, and the health of the Delta will continue to decline.
135	Bayla Greenspoon	The health and well-being of the rivers and the many who depend on the them should not, MUST NOT, be sacrificed for the profit of the few down south. The ultimate costs are too great and too short-sighted to be viable.
137	Ellen Koivisto	Only a fool makes the same mistake over and over again, but apparently California is being run by anti-science fools. This proposal is yet another attempt to "solve" a problem created by these exact same strategies decades ago. It didn't solve anything then and it won't solve anything now. It will only make everything worse.

139	Elke Rank Zone 7 Water Agency	Delta Conveyance, and the State Water Project, are critical components to support regional and local water supplies – including the Bay Area. Zone 7 receives nearly 90% of its water supply from the Delta, making these two components of utmost importance to reliably provide water to over 260,000 residents and to about 3,500 acres of irrigated agriculture in the East Bay.
139	Elke Rank Zone 7 Water Agency	We are actively pursuing ways to diversify our supplies and enhancing resilience locally through the collaborative Bay Area Regional Reliability Partnership. Still, Delta Conveyance is an indispensable project. It serves to protect us against Delta outages due to earthquakes, climate change, etc., and it is critical to the Tri-Valley's health and economic prosperity.
150	Colin Diaz Westside Council of Chambers of Commerce	More than 30 percent of Southern California's water supply comes from the Sierra Nevada and it provides the backbone water supply for millions of people, our $1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes.
150	Colin Diaz Westside Council of Chambers of Commerce	We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now.
150	Colin Diaz Westside Council of Chambers of Commerce	This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important.

153	Charles Wilson Southern California Water Coalition	For decades, Southern California has invested in smart integrated water supply solutions such as groundwater recharge and storage, recycled water, captured runoff, and desalination of seawater and brackish groundwater. However, a common misperception persists that initiatives like wastewater reuse, stormwater capture and reuse, household rain barrels and water use efficiency can replace imported water supplies for Southern California. This thinking ignores critical facts about the region's hydrology, the water conservation measures already in place, and the importance of this region and its residents, businesses and farmers to the state's economy. Indeed, Southern California has invested—and will continue to invest—heavily in these types of programs that improve regional resilience and stretch scarce water supplies. However, these types of projects cannot entirely replace imported supplies. What they can do is ensure that we make the best possible use of our imported supplies by doubling or even tripling their use through water recycling and groundwater recharge and storage projects that allow us to use each drop more than once. Of course Southern California will continue to leverage technology and behavior change to reduce water use—however many agree that increasing water efficiency becomes more difficult over time as demand hardens.
162	Gene Beley	The entire nation is once again headed for a recession, Big Time. Start using some common sense! Stop this tunnel construction water grab nonsense now.
168	Rachel Rolnicki Orange County Business Council	More than two-thirds of all Californians either reside in the SCAG region or in other areas dependent on an aging, deteriorating system of dirt levees, aqueducts, pipes and canals. Improvements to the statewide water delivery system are long overdue. OCBC vocally supported the California WaterFix project during Governor Jerry Brown's administration, during which Governor Brown proposed a two-tunnel project. OCBC strongly supports Governor Gavin Newsom's revised plan to construct a single pipeline water conveyance system. Crucially, Governor Newsom's vision would both safeguard the Deltas ecosystem and ensure the delivery system is more resilient to climate change impacts.
168	Rachel Rolnicki Orange County Business Council	Nearly 35 percent of Orange County's total water supply, serving more than 2.3 million of its residents, is received through the current conveyance system. Additionally, 100 percent of Southern California's six-month emergency water supply is stored in Diamond Valley Lake, which also receives its water from the current conveyance system. In the event of a destructive earthquake, Southern California would likely be deprived of this crucial water source and the region's emergency reserves would be either unreliable or inaccessible.

168	Rachel Rolnicki Orange County Business Council	Importantly, there are lessons to be learned from California WaterFix and the legal, environmental and financial struggles that prevented its success. It is imperative that the issues that plagued California WaterFix are avoided by all means possible, as this project is urgently needed. In the event of a major earthquake or drought, Southern California's water supply will be massively disrupted in the absence of a modernized water delivery system. The current timeline for the Project aims to begin construction in 2023. The Project will take 13 years to construct and commission; therefore, the earliest completion date would be 2036. OCBC strongly recommends that construction begins by 2023 and is not delayed. Every year the project is delayed, the water supply depended on by the majority of Californians is jeopardized.
168	Rachel Rolnicki Orange County Business Council	Governor Newsom altered Governor Brown's proposal by downsizing from a two tunnel project to a one tunnel project. The single tunnel reduces the cost of the Project and serves as a compromise between the proponents and opponents of California WaterFix. Despite this balance, some opponents argue that the status quo must be preserved and that no substantive improvements to the water conveyance system should be made. Opponents of the tunnel propose that individual water districts should instead invest in local resources, storm water recovery, and other infrastructure projects. These strategies are certainly vital for solving problems involving water supply. Many water districts across the state are already committed to implementing these strategies. However, these alternatives focus on problems related to supply, and do not address problems involving conveyance. The only true alternative to the Project is to not complete it, which would endanger the safety and economic future of the majority of Californians. A comprehensive approach to addressing California's water challenges is the best path forward.
171	William Roltsch	There needs to be fair usage of water in the state, not usage based on the degree of bluster by some parties. Losing fish and wildlife species is forever. Commercial fisheries, sports fisheries, Native American heritage, and the tourism industry all must be accounted for in statewide water decisions.
181	Liz Elias	A perfect example of the latter is the "Delta Conveyance Project," which is nothing more than political doublespeak for the old, tired, tunnel project, designed to steal water from Northern California's most sensitive environmental area for shipment to Los Angels and environs so they can have swimming pools and lush lawns. Supporting agriculture in the central valley is one thing, and there are options there. But the wholesale theft of water from the San Francisco Bay Delta region is unacceptable. Even with just one tunnel, the projected 3 – 7.5 thousand cubic feet of water per second is a staggering amount, incomprehensible for most people to envision, but it would have devastating, irreversible effects on the health of the Delta ecosystem.
182	John Armstrong	Comment opposes the project on the basis that the agribusiness is exporting natural resources (water and soil mineral resources) by exporting crop. Commenter also states that MWD has stated that they already have more water than they need.
186	Phyllis Johnston	Comment states that project beneficiaries are farmers that shouldn't be farming in dry southern California land.

191	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	The tunnel will not save lives form the levee collapse scenario, whereas levee strengthening projects will. This flood could kill poor farmworkers and low-income communities around the Delta much like Katrina destroyed the lower 9th Ward in New Orleans.
235	Tim Stroshane Restore the Delta	DWR continues to avoid in this NOP situating its new DCP (previously its California WaterFix) objectives and purpose in the overall framework of state water and civil rights policies. Questions that need answers include: •How does this project claim to further the state constitutional requirement that all water use as well as methods of diversion are to be reasonable and beneficial? •How does it claim to further the statewide mandate from state case law that reasonable and beneficial use of water must protect the public trust resources of the state, which include fish, water itself, and recreational beneficial uses, among others? •In 2009, the Legislature declared that it is the policy of the state to reduce reliance on the Delta for California's future water needs. How does the new DCP address this mandate to reduce reliance on the Delta for importation of water? •How might the new DCP claim to promote environmental justice for Delta communities when it clearly proposes to remove water from the Delta and degrade water quality here in the midst of one of California's most economically distressed communities in the City of Stockton? RTD insists that the Draft EIR incorporate answers to these specific questions about purpose and need.

235	Tim Stroshane Restore the Delta	We further urge that the Draft EIR fully evaluate the claim in the objectives of the NOP that the new DCP will actually solve problems raised by both climate and seismic risks. Though seismic risk to Delta levees may be conceptually reduced relative to what was thought a decade ago when California WaterFix and the Bay Delta Conservation Plan were in early planning stages, this does not mean there is no risk. The reduction in risk, however, merits "attenuation" in the state's rhetoric about seismic risk to Delta levees, and in the rhetoric of the state's allies concerning some new type of Delta conveyance. Delta levees are still needed. Each iteration of California WaterFix's operations since 2012 relied for some portion of the year on conveyance of state and federal stored water in and through Delta channels to reach the state's Banks Pumping Plant near Byron and the federal Jones Pumping Plant near Tracy. Through-Delta conveyance means passage of water intended for export between Delta levees for the entire distance. Environmental reviews of the tunnels project revealed that about half the time (48 percent) on average the south Delta pumps would continue to be the point from which state and federal exports would originate. DWR and the Bureau sought to modify their water rights permits from the State Water Resources Control Board between 2015 and 2019 to add points of diversion in the north to augment their south Delta pumping plants—not to replace the south Delta diversions with the north. There would be times when listed fish species would be present or fresh water flows entering the north Delta would be too low (seasonally or from drought) to permit such diversions through the tunnels. Sending water through leveed Delta channels is still vital to the State Water Project and the Central Valley Project in addition to the health of the Delta itself. Over the last decade of water debates we at Restore the Delta have continually found it irresponsible of tunnels advocates to push for tunnels as some sort of seismic insurance policy while excluding Delta levees from that same treatment. We have no reason to believe at this time that a new DCP would have less need for Delta levee stability in the face of any level of seismic risk than did California WaterFix. Delta levee stability investment is an essential component of any investment in long-term conveyance for the Delta—with or without a single-tunnel concept—whether the levee failure hazard results from earthquakes or sea level rise due to climate change. If DWR and the Bureau, and their urban and agricultural customers, are to continue exporting water from the Delta for the long haul, they must recognize that Delta levees are essential to their future as well as to the Delta's—and help persuade the public to support Delta levee investments, and soon. And this is true regardless of whether concerns for Delta levee stability are seismic or climate-based in origin. Delta levees need to be addressed in either case. Why doesn't the NOP recognize this reality? Does it mean that DWR is an earthquake and climate denier, even as it stresses need for the new DCP as a seismic and sea level rise protection measure? Please consider our report, Climate Equity and Seismic Resilience for the San Francisco Bay-Delta Estuary, where we address both climate and seismic risks to the Delta.1 1the%E2%80%A8-san-francisco-bay-delta-estuary/.

247	Jeffrey Kightlinger Metropolitan Water District of Southern California	While we agree with the project purpose and objectives, the purpose and objectives should expressly and explicitly state that the project must be "cost effective", meaning that the project must make economic sense for the Public Water Agencies (PWA), like Met, which will fund all of the costs. Under CEQA, a project and its alternatives must be feasible to implement, and feasibility includes "economic viability". We recommend adding to the end of the project purpose statement the statement that development of new Delta conveyance facilities must be "in a cost-effective manner".
248	Tom Williams	Provide objectives for DC and for WaterFix and clearly identify those that differ between the two project. DWR Q&A 2/1 5.
258	Barbara Barrigan-Parilla Restore the Delta	We think the NOP is inadequate because it doesn't answer if the Central Valley project is in or out of this project.
265	Molly Culton Sierra Club of California	The proposed project will not restore or protect water reliability for California. Indeed, the proposed project will worsen environmental health conditions in the Delta
265	Molly Culton Sierra Club of California	The state continuously argues that this will not increase diversions from the Delta, but we know this is not the case. Due to both state and federal proposals relating to operations of the respective systems, diversions from an already fragile ecosystem will increase and the tunnel will facilitate those diversions.
272	Arthur Knudson	The project's goals and objectives look like they are centered around improving reliability of water deliveries, and it seems like this need is being lost to improve the ecosystem that has collapsed. One of the original co-equal goals was to restore the ecosystem. I want to make sure that doesn't get lost. Please consider ecosystem restoration.
282	Tim Stroshane Restore the Delta	The statement of purpose and objectives fails to include the purpose of giving and facilitating for water contractors more incentives to seek and transact water transfers from north of Delta willing sellers.
283	James Thuerwachter California Alliance for Jobs	Our organization believes that the pumping capacity of 6,000 CFS will greatly improve our ability to protect water quality and reliability. However, we do caution the board against considering smaller capacities.
294	Michael Lewis Construction Industry Coalition on Water Quality	Produce a project that will respond to the ever-changing and less-predictable supply of snowpack that melts and traverses the Delta. A modern system can keep flows manageable and still provide water for export while preserving the Delta certainly far better than the existing system can.
295	Connor Everts Environmental Water Caucus	Consider the value of not doing this project. Cities in Southern California are getting off imported water. We are maximizing local water resources. If you look at that, you'll see the lack of need for this project.

325	Bill Wells California Delta Chamber and Visitor's Bureau	Item number four, "How is the current environmental review process different than before?" I don't think it is. It looks quite similar to the last one. Here's what somebody else testified -- a taxpayer in one of the earlier meetings: Extensive evidentiary showings in the prior State Water Resources Control Board hearings and Delta stewardship council hearings show that neither of these agencies can approve intakes in these locations, i.e., Hood and where they plan to put them in, because it would not be consistent with the Public Trust Doctrine or the Reform Act from the Delta Stewardship Council. Okay. I know quite a bit about that, because I was the one who testified that Hood would be a bad location to put the intakes. And the water board, so here we are, right, deja vu all over again with the same thing. So one of the things we ask over and over is give us a few examples where something like this has worked. And there are plenty where it hasn't. I direct your attention to the Colorado River Delta, Mono Lake, Tulare Lake, Buena Vista Lake, all destroyed by water diversions.
340	Dan Nomellini, Jr. Central Delta Water Agency	And as far as scoping comments, the game is to design the project objective so it rules out these other broader solutions, so I would urge you not to do that; but I know you're going to do that.
385	Kelly Abreu Sierra Club of California - Water Committee	The goals and objectives of the project are all about security and -- security of supply and stability of supply. That's the wrong goal. The goal should be -- needs to be addressing -- install flexibility into the system, because the future of water supply in the state -- it's going to be very unstable. You need flexibility.
417	Barbara Daly	In the opening comments, you state that the project would be consistent with the State Water Resilience Portfolio, and you listed many objectives of the project, but the most important objective was not shown in your opening presentation. And we request that you add this as an objective or actually a goal to your current list, if you would. To explain, the California State Legislature established the Delta Reform Act in 2009, which created the coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The Reform Act also states -- and this has not been changed or altered since then, this is in law -- that these coequal goals, these are goals, shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. This is California Water Code 585054. We request that you put these into your goals.
507	James Cox California Striped Bass Association	Where is the habitat restoration? I've yet to see word one about that, and that is why the previous plan was not approved by the Delta Stewardship Council. When will we see something about habitat in all of this?
514	Jan McCleery	It's ironic that the stated purpose of the tunnel is to mitigate climate change in order to fuel consumer electricity is used pumping water up over the Tehachapi to LA.
518	Mariah Looney Restore the Delta	The tunnel does not improve safety from flooding because it prioritizes water as sports rather than the public's safety from floods.

538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	Finally, it should be noted that a seismically-resilient levee system does not mean that every levee has to be earthquake proof, just that the system is resilient. Water exports are only significantly interrupted if over 20 levees fail in earlier DWR modeling. A system can still be resilient and protect water exports if some failures occur.
542	Bruce Campbell	A map within the NOP shows Shasta Dam and Trinity Lake / Lewiston Dam as components of the nearly statewide plumbing network relating to the DCP, but that map happens to "whiteout" the Trinity River which is generally a bluish color both visually and on most maps (as water courses tend to be). Instead, the map pretends that the Trinity River watercourse further west than the lake and dam by the upper Trinity does not exist! The tribal nations of Humboldt County do not get the flows of 50,000 acre-feet that they were promised from the Trinity River partly due to already excessive diversions from the Trinity to feed the thirst of Central Valley agri-business. Originally some of those acre-feet allotted to Humboldt County tribes was to go to spur some economic development in the lower Klamath region, but seeing that the Trinity / Klamath watercourses were flowing so low, they decided to keep their allotment in the river (but the amount was less than what was promised). That map also mentions the "Trinity System." Well, the main mileage of the Trinity system is below Trinity Lake, and it happens to be the Trinity River – Klamath River (or Klamath-Trinity if you prefer) watershed since, yes indeed, the Trinity River empties into the Klamath River at Weitchpec, California. I guess that basic info that an elementary school student could grasp might be news to Central Valley-based major water diverters at DWR – or else it is a ploy to try to avoid thorough analyses of the aforementioned variety.
542	Bruce Campbell	Though a couple mitigation ideas may be forthcoming in the DEIR in regards to restoration, but such is not indicated in the NOP. So, once again, "restoration" is getting less and less attention in environmental impact documents relating to a Delta tunnel (or tunnels as was the previous proposal). with the Notice of Preparation for the so-called Delta Conveyance Project, the term "environmental justice" is not even mentioned or acknowledged in that document. Realizing that environmental justice was a notably weak point in their analysis, goals, and objectives (not even earning a token mention), apparently the DWR hired those couple nice women from a non-profit who were in the back of the room at the Los Angeles hearing on the DCP to do outreach to environmental justice communities. Though I believe that those two women tried, but that does not make up for total omission of environmental justice issues (or the term itself) from the Notice of Preparation for the DCP. Plus, there still should have been either a coastal Humboldt County scoping hearing or else a DCP scoping hearing in Hoopa in inland Humboldt County. Such a hearing should have been held either in Arcata which is at the western end of Highway 299, in Klamath which is near the mouth of the Klamath River(though unsure if there is a venue large enough there), or in the most populated area along the Trinity (by indigenous people, or otherwise for that matter) -- the town of Hoopa on the reservation for the Hupa tribe.

542	Bruce Campbell	It clearly says on page 5 of 12 of the NOP that "The proposed project would construct up to two north connecting tunnel reaches to connect the intakes to an Intermediate Forebay (see Forebays section below), a single main tunnel from the Intermediate Forebay to a new Southern Forebay, and two connecting south tunnel reaches part of the proposed project's South Delta Conveyance Facilities (see "South Delta Conveyance Facilities section below) to connect to the existing SWP, and potentially CVP, facilities in the south Delta." One could contend that there are 4 or 5 tunnels proposed as part of the DCP!!!!! Common sense dictates that a "tunnel reach" is a tunnel, and thus there will be one or two of such "tunnel reaches" at the northern end before the main tunnel kicks in, and then there will be two more tunnel reaches built toward the South Delta.
552	Nicole Suard Snug Harbor Resorts	A stated goal of the latest version of DWR/SWC conveyance plan is "To protect the ability of the SWP, and potentially the CVP, to deliver water when hydrologic conditions result in the availability of sufficient amounts, consistent with the requirements of state and federal law, including the California and federal Endangered Species Acts and Delta Reform Act, as well as the terms and conditions of water delivery contracts and other existing applicable agreements." There should also be the stated goal of protection from diversions out of the Sacramento River watershed and Delta when there continue to be clear physical indicators of ongoing degradation of the surface water quality and drinking water quality in the Delta and Sacramento River Watershed area.
555	Jeffrey P. Sutton Tehama Colusa Canal Authority	TCCA hereby requests that this project be developed and designed in a manner that avoids redirected negative impacts to the CVP, the Sacramento Valley, and the TCCA Water Districts, such impacts of concern include the following: financial impacts, regulatory impacts, operational impacts, upstream storage impacts, environmental impacts, water supply impacts, and water delivery impacts.
560	Bradford Pappalardo Steamboat Resort	The first and most important aspect about the conveyance is where and why. What is the goal and the purpose for the project and what are some of the alternatives to meet those goals. Until we can address what is the best place for this project, how can you determine the environmental impact?
560	Bradford Pappalardo Steamboat Resort	The Department of Water Resources (DWR) seems fixated on placing the diversion in the middle of the Delta, but why? I have heard nothing on how they arrived at that conclusion.

562	Barry Sgarrella SolAgra Corporation	The project purpose and need of DCP can be met by the SolAgra Water Solution. In particular, diversions from the Delta under the SolAgra Water Solution can occur in a manner that "minimizes or avoids adverse effects to listed species, and allows for the protection, restoration and enhancement of aquatic, riparian and associated terrestrial natural communities and ecosystems." Due to the location of the SolAgra intakes on Sherman Island in the western Delta, diversions can also "[r]estore and protect the ability of the SWP and CVP to deliver up to full contract amounts when hydrologic conditions result in the availability of sufficient water." Even in the case of insufficient available water quantities, as California has experienced during the most recent five year drought, the SolAgra Water Solution would augment the available water supply by providing an additional 1 Million Acre-Feet/ year ("MAF") of newly created water via a brackish water desalination plant on Sherman Island. Using state-of-the-art desalination technologies, this water supply would be drought proof and would be immune to droughts and projected sea level rise.
568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	The Proposed Project ignores the need to reduce reliance on exports of water from the Delta. The hydrology of the Delta watershed is inadequate to support even the past level of exports.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	We believe that credible and impartial environmental and economic analyses of a proposed project and alternatives are essential, in contrast to the fundamentally flawed analyses that DWR previously performed for the Bay Delta Conservation Plan ("BDCP") and California WaterFix project, including the final EIR for which DWR ultimately withdrew certification. However, as discussed on the pages that follow, we are concerned that language in the NOP could prevent consideration of a reasonable range of alternatives, preclude analysis of impacts from the whole project, unreasonably limit consideration of the likely environmental impacts, and fails to provide a stable and accurate project description. We therefore strongly urge the Natural Resources Agency to reconsider the approach to the proposed project and analysis of environmental impacts described in the NOP.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	CEQA requires that the project description contain a clear statement of the project objectives, including the underlying purpose of the project. Cal. Code Regs., tit. 14, § 15124(b). The project's purpose and objectives are relevant to defining the reasonable range of alternatives that must be considered in the DEIR. Id., § 15126.6(a). However, DWR's purpose and objectives in the NOP are inconsistent with State law and could limit consideration of feasible alternatives. DWR must revise the Purpose and Objectives statement and ensure that the statement does not limit meaningful consideration of alternatives that significantly reduce diversions from the Delta. In contrast to DWR's purpose and objectives for the BDCP/WaterFix, the purpose statement in this NOP omits any consideration of protecting and restoring the Bay-Delta ecosystem and/or the co-equal goals for the Delta, and instead makes the project purpose solely to "restore and protect" water diversions from the Delta, as the table below demonstrates. BDCP/Water Fix "DWR's fundamental purpose in proposing the BDCP is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south-of-Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations." Single Delta Conveyance "DWR's underlying, or fundamental, purpose in proposing the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State's Water Resilience Portfolio." This purpose statement in the NOP is inconsistent with state law, the best available science regarding climate change and ecosystem health, and the Newsom Administration's publicly stated objectives for the project. DWR must significantly revise this proposed purpose statement to eliminate language suggesting the purpose is to increase water deliveries from the Delta to ensure that this language does not exclude consideration of a proposed project or alternatives that reduce water diversions from the Bay-Delta.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	First, the project purpose to "restore" State Water Project water deliveries suggests that the proposed project should maintain or increase water diversions from the imperiled estuary. However, increasing water diversions from the Delta is inconsistent with the best available science regarding both the effects of climate change and legally required protections for the Bay Delta ecosystem. For instance, DWR's 2019 Climate Change Vulnerability Assessment found that climate change is likely to reduce median State Water Project diversions from the Delta by 10% by 2050 (deliveries reduced by 312,000-acre feet per year). Other recent analyses, such as Ray et al 2020, also have concluded that climate change is likely to result in reduced SWP diversions from the Delta. Equally important, numerous analyses by state and federal agencies have concluded that increased protections for native fish and wildlife, including threatened and endangered species, are needed to prevent extinction and to comply with state laws, and that these increased environmental protections (e.g., increased instream flows, increased Delta outflow, improved temperature management, improved migratory survival through the Delta) would be likely to reduce diversions from the Delta.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Similarly, the NOP's stated purpose of increased SWP water diversions from the Delta, without any investment in local and regional water supplies to reduce reliance on the Delta, is inconsistent with state law. The Delta Reform Act established state policy to reduce reliance on the Delta and to meet state water needs through investments in sustainable local and regional water supply projects, such as improved water use efficiency and water recycling. Cal. Water Code § 85022. While the purpose statement in the NOP references the State's Water Resilience Portfolio, the purpose statement does not explicitly require reduced reliance on the Delta, and it appears to focus on increasing ("restoring" to some higher level) water deliveries from the Delta. More generally, the reference to the Water Resilience Portfolio does nothing to cure the deficiencies in the NOP's stated purpose. The Portfolio has not yet been finalized, does not commit any funding, fails to include enforceable deadlines, and fails to include linkages between the actions (including with new conveyance). The purpose and objectives should be revised to explicitly include reduced reliance on the Delta through a program of investments in local and regional sustainable water supply projects, and by deleting the word "restore" to avoid any implication that the project purpose is to increase water diversions from the Delta, rather than reducing water diversions as necessary to comply with the California Endangered Species Act and other state laws.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Finally, the purpose statement and objectives in the NOP are inconsistent with the Newsom Administration's public statements regarding Delta conveyance. For instance, the Governor's 2019 State of State speech emphasized that in addition to protecting water supply, a single Delta tunnel project must also "preserve Delta fisheries," and that conveyance must be part of a portfolio with water recycling and water conservation. Similarly, the draft Water Resilience Portfolio Report (Recommendation 19.1) emphasized that a Delta tunnel must "protect water quality," "support ecosystem restoration," and "limit local impacts." The purpose and objectives in the NOP wholly omit any consideration of these essential attributes of a sustainable project.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	We therefore urge DWR to significantly revise the purpose and objectives of Delta conveyance to eliminate any suggestion that the project's purpose is to increase water diversions from the Delta, to explicitly require reduced reliance on the Delta and investments in local and regional water supply projects as part of a true portfolio, and to incorporate protection and restoration of the Bay-Delta ecosystem as a co-equal purpose of the project.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	CEQA requires that an environmental impact report analyze a reasonable range of alternatives to the proposed project, including a no project alternative. Cal. Pub. Res. Code §§ 21002, 21061, 21100; tit. 14, Cal. Code Regs. § 15126.6. Here, a reasonable range of alternatives must include not only one or more alternatives that reduce diversions from the Delta, but also one or more alternatives that include a single Delta tunnel as part of a portfolio of local and regional water supply investments. However, language in the NOP does not appear to consider alternatives that reduce diversions from the Delta and fails to include new conveyance as part of an enforceable portfolio of local and regional water supply projects.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	First, because the purpose and objectives of a project define what alternatives are reasonable, id. at § 15126.6(a), as discussed supra it is essential that the State revise the NOP's purpose and objectives to ensure consideration of alternatives that significantly reduce diversions from the Bay-Delta as needed to comply with state and federal laws. Here, the NOP identifies a range of alternatives based on size of new conveyance (from 3,000 to 7,000 cfs), but it does not identify a range of operational criteria. Instead, it suggests that the alternatives would "increase DWR's ability to capture water during high flow events," and that it would identify "initial operating criteria" rather than a range of operational criteria. However, that approach to operations ignores: (1) the best available science regarding the need to substantially increase Delta outflows and reduce diversions to protect fish and wildlife during portions of most water year types, including wetter years; (2) more restrictive pumping limits in the South Delta to offset the new environmental impacts caused by the North Delta diversion facility(ies); (3) the best available science showing that diversions from the North Delta reduce salmon survival when flows below the proposed intakes are less than 35,000 cfs (Perry et al 2018). While it is true that the Supreme Court in 2008 upheld the final EIR for the CALFED program despite the fact that the document did not consider a reduced export alternative, In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings, 43 Cal. 4th 1143, 1168 (2008), changes in state law and the best available scientific information demonstrate that a EIR for this project must consider alternatives that reduce diversions from the Bay-Delta. For instance, the subsequent enactment of the Delta Reform Act now makes ecosystem restoration a co-equal purpose with improving water supply reliability and establishes state policy to reduce reliance on the Delta. Similarly, the best available science regarding the effects of climate change and ecosystem restoration demonstrate that reduced water diversions are needed to meet water quality standards and comply with state and federal endangered species acts. As a result, the EIR for this project must consider alternatives that result in reduced diversions from the Delta, even as the physical reliability of the system may be improved with new conveyance.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	We are concerned that the approach to the Delta Conveyance Project and environmental analysis described in the NOP is significantly flawed. Those concerns are heightened by DWR's recent deeply flawed DEIR for Operations of the State Water Project, and by the continuing delay of the State Water Resources Control Board's update of the Bay-Delta Water Quality Control Plan. Before the State and public considers a new Delta Conveyance Project or other major water storage and diversion projects that are likely to significantly worsen environmental conditions in the Delta, the State Water Resources Control Board should first establish updated flow and water quality standards that will achieve salmon doubling, prevent extinction, and protect and restore native fish and wildlife and the health of the Bay-Delta watershed. We strongly encourage the Natural Resources Agency to reconsider the approach identified in the NOP, consistent with these comments.

576	Kelley Taber Sacramento County Water Agency	The Project objectives (NOP, p. 2.) are too narrowly drawn, focusing only on benefits to State Water Project (SWP) operations and south of Delta water deliveries. The objectives reference providing "operational flexibility to improve aquatic conditions in the Delta" but the Project does not commit to improving aquatic conditions, nor does it include any objectives that would protect water supplies for water users in and upstream of the Delta. Framing Project objectives so narrowly could discourage consideration of alternatives to the Project that would protect and restore the Delta environment and thus is inconsistent with the California Environmental Quality Act (CEQA) as well as with the Delta Reform Act's coequal goals of improving water supply reliability and protecting, restoring, and enhancing the Delta ecosystem, as well as the Legislature's directive that "coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place." The Project objectives should be expanded to include prevention of water quality degradation in the Delta and avoidance of adverse impacts to water users in and north of the Delta, including impacts to Delta public facilities (which would include the FRWP), consistent with the Delta Plan, as discussed further in section II.F, below.
598	Bill Emlen Solano County	The NOP provides that the purpose of the Project is to "develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta". Since the Project will also involve federal agencies, it therefore must comply with the National Environmental Policy Act (NEPA) for all federal actions. However, as indicated in the NOP introduction, DWR proposes to only prepare an EIR and include "relevant NEPA information in the EIR, where appropriate." In order to reduce redundancy and to fully assess impacts for the entire Project, DWR should conduct a joint review process with the federal agencies and prepare a combined EIR and Environmental Impact Statement (EIS) that complies with all applicable laws. Such elimination of duplication is set out in federal regulation. (40 C.F.R. § 1506.2(c)). Furthermore, the proposed new facilities are to operate, along with the existing south Delta pumping facilities, as "dual conveyance" methods to divert and convey water. As such, the entire Project, including state and federal Project components and their operations, need to be addressed in detail as part of environmental review as the effects on the Delta include both the physical effects from construction and the changes in flow that could create water temperature, water quality and other problems to the Delta.

602	Patrick Porgans Porgans & Associates	DWR's latest "one-tunnel alternative" is just the latest rendition of a myriad of failed attempts to suck more water from the Delta as a means to seep the SWP financially afloat. It is important to note, that DWR had 60-years to provide the Delta protection, which has cost California's more than $13 billion in borrowed money to fund a plethora of studies and programs purportedly to protect the Delta and double salmon and pelagic species. The Bay-Delta is the largest remaining estuary on the west coast of the Americas, and essentially is being studied to death. While DWR asserts that it intend to conduct a thorough EIR to assess and mitigate the impacts of the proposed alternative Project, it has failed to adequately address, assess and mitigate the impacts attributable to the SWP!
610	Henry Kuechler Reclamation District No. 2060	The assumptions used to develop the project objective of protecting against water supply disruptions due to a major earthquake in the Delta seemingly do not consider updated levee data and recent studies that reflect a lower probability of flooding due to an earthquake event. The objective must be re-evaluated based on the actuarial risk of extensive flooding from a seismic event causing disruptions to water supplies.
612	Warren Bogle Reclamation District 150	The assumptions used to develop the project objective of protecting against water supply disruptions due to a major earthquake in the Delta seemingly do not consider updated levee data and recent studies that reflect a lower probability of flooding due to an earthquake event. The objective must be re-evaluated based on the actuarial risk of extensive flooding from a seismic event causing disruptions to water supplies.
615	Justin Fredrickson California Farm Bureau	A resilient statewide system, including a viable package of short-term, near-term, and long-term Delta conveyance improvements, should provide a reliable and sufficient supply of fresh water suitable for irrigation, normal crop yields, and long-term sustainable management of soils. This is essential to avert unwise long-term reliance on net food imports and to maintain California's place as a major contributor to the core food and fiber needs of our state and nation.
615	Justin Fredrickson California Farm Bureau	Investments in our statewide water system and in Delta conveyance solutions, specifically, should seek to halt and restore past losses of municipal and industrial and agricultural water supplies to increasing regulatory controls and steadily ballooning environmental water demands. Consistent with the California Constitution, environmental water users, like other uses of water, should be held to a high standard of reasonableness, non-waste and efficiency, including scientific accountability, management of non-flow stressors, and demonstrated efficacy to achieve declared objectives. Mitigation responsibilities should be proportionate, and tied to impacts having a clear causal link to the activities of agricultural and other water users—and should be not imposed arbitrarily, inflexibly or ineffectually for background conditions neither clearly caused by, nor within the reasonable control of those users.

616	Larry Gardiner Brannan-Andrus Levee Maintenance District	The assumptions used to develop the project objective of protecting against water supply disruptions due to a major earthquake in the Delta seemingly do not consider updated levee data and recent studies that reflect a lower probability of flooding due to an earthquake event. The objective must be re-evaluated based on the actuarial risk of extensive flooding from a seismic event causing disruptions to water supplies.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	The list of potential impacts associated with the proposed project in the NOP is inadequate. Environmental justice effects are omitted. Public health effects are confined to risk of mosquito-borne diseases, which are routinely controlled by mosquito abatement districts. Harmful algal blooms (HABs) are not mentioned but must be considered. Construction and operational effects to transportation and noise levels must also be addressed. Disturbance of channel sediments that may contain mercury, selenium, arsenic, and chromium 6 must be addressed for their water quality, public health, cost of treatment and environmental justice effects.
632	Robert Hunter Municipal Water District of Orange County	The state water reliability strategy cannot be successful without the infrastructure necessary to capture wet-period supplies. The water that Southern California relies on for drought and emergency-needs is dependent on securing an abundant amount of imported supplies. Modernizing conveyance through the Delta, in combination with Metropolitan's and its member agencies' past and continued efforts, provides flexibility to deal with droughts and climate change, and guard against disruptions from earthquakes or levee failures in the Delta. Projections of availability of water in wet years from the operations of Delta conveyance facilities, combined with the potential for earlier season snow melt in California, will require conveyance and additional storage on a statewide basis to help capture water when it is available. The earlier snowpack melt has been analyzed as a potential loss of 14 million acre-feet of storage from having the snow remain in the mountains longer.

635	Jim Rich	The first weakness is that the NOP appears to ignore DWR's own guidance on the plan formulation process for major water projects, especially as that guidance relates to considering project alternatives.]The authors of the NOP pay lip service to this guidance near the top of Page 15 of the NOP, where they admit that State law requires that the "EIR shall describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, this NOP does not consider such alternatives. Instead, in the second paragraph on Page 15, the authors state, "In identifying the possible EIR alternatives to be analyzed in detail, DWR is currently considering alternatives with capacities that range from 3,000 to7,500 cfs, with varying degrees of involvement of the CVP, including no involvement." All of these alternatives appear to be structural alternatives which involve various types and sizes of Delta tunnels to convey more SWP water (and perhaps more CVP water as well) to contractors south of the Delta. There is no mention of evaluating the environmental or socio-economic impacts of any non-structural alternatives, or of structural alternatives which do not involve large tunnels going through the Delta. It's a real shame that DWR ignored State law and its own guidelines in preparing this NOP, for there are "reasonable alternatives to the [proposed] project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."
637	Osha Meserve Local Agencies of the North Delta	The NOP outlines a cursory description of a Single Tunnel project that is the same in almost every respect to the failed California WaterFix ("CWF") project. Moreover, the NOP contains no references to coordination on actions such as levee strengthening, water quality improvements, groundwater recharge or other "resilience "tools. In addition, the Delta Conveyance Design and Construction Authority has thus far refused to pause its Stakeholder Engagement Committee process despite the COVID-19 pandemic, undermining prior commitments to work with Delta communities and other stakeholders to limit local impacts of the project. Thus, it appears that project design and engineering is continuing without the promised local engagement, and without substantive progress on related actions to improve California's water supply resilience.
662	John McManus Golden Gate Salmon Association	GGSA is concerned that language in the NOP could prevent consideration of a reasonable range of alternatives, preclude analysis of impacts from the whole project, unreasonably limit consideration of the likely environmental impacts, and fails to provide a stable and accurate project description. We therefore strongly urge the Natural Resources Agency to reconsider the approach to the proposed project and analysis of environmental impacts described in the NOP.

662	John McManus Golden Gate Salmon Association	DWR's purpose and objectives in the NOP are inconsistent with State law and could limit consideration of feasible alternatives. DWR must revise the Purpose and Objectives statement and ensure that the statement does not limit meaningful consideration of alternatives that significantly reduce diversions from the Delta. In contrast to DWR's purpose and objectives for the Bay Delta Conservation Plan and California WaterFix projects, the purpose statement in this NOP omits any consideration of protecting and restoring the Bay-Delta ecosystem and/or the co-equal goals for the Delta, and instead makes the project purpose solely to "restore and protect" water diversions from the Delta, as the table below demonstrates. BDCP/WaterFix: "DWR's fundamental purpose in proposing the BDCP is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south-of-Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations." Single Delta Conveyance: "DWR's underlying, or fundamental, purpose in proposing the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State's Water Resilience Portfolio." This purpose statement in the NOP is inconsistent with state law, the best available science regarding climate change and ecosystem health, and the Newsom Administration's publicly stated objectives for the project. DWR must significantly revise this proposed purpose statement to eliminate language suggesting the purpose is to increase water deliveries from the Delta to ensure that this language does not exclude consideration of a proposed project or alternatives that reduce water diversions from the Bay-Delta.
662	John McManus Golden Gate Salmon Association	First, the project purpose to "restore" State Water Project water deliveries suggests that the proposed project should maintain or increase water diversions from the imperiled estuary. However, increasing water diversions from the Delta is inconsistent with the best available science regarding both the effects of climate change and legally required protections for the Bay-Delta ecosystem. For instance, DWR's 2019 Climate Change Vulnerability Assessment found that climate change is likely to reduce median State Water Project diversions from the Delta by 10% by 2050 (deliveries reduced by 312,000-acre feet per year). Other recent analyses, such as Ray et al 2020, also have concluded that climate change is likely to result in reduced SWP diversions from the Delta. Equally important, numerous analyses by state and federal agencies have concluded that increased protections for native fish and wildlife, including threatened and endangered species, are needed to prevent extinction and to comply with state laws, and that these increased environmental protections (e.g., increased instream flows, increased Delta outflow, improved temperature management, improved migratory survival through the Delta) are likely to reduce diversions from the Delta.

662	John McManus Golden Gate Salmon Association	Similarly, the NOP's stated purpose of increased SWP water diversions from the Delta, without any investment in local and regional water supplies to reduce reliance on the Delta, is inconsistent with state law. The Delta Reform Act established state policy to reduce reliance on the Delta and to meet state water needs through investments in sustainable local and regional water supply projects, such as improved water use efficiency and water recycling. Cal. Water Code § 85022. While the purpose statement in the NOP references the State's Water Resilience Portfolio, the purpose statement does not explicitly require reduced reliance on the Delta, and it appears to focus on increasing water deliveries from the Delta. The purpose and objectives should be revised by explicitly including reduced reliance on the Delta through a program of investments in local and regional sustainable water supply projects, and by deleting the word "restore" to avoid any implication that the project purpose is to increase water diversions from the Delta, rather than reducing water diversions as necessary to comply with the California Endangered Species Act and other state laws.
662	John McManus Golden Gate Salmon Association	Third, the purpose statement and objectives in the NOP are inconsistent with the co-equal goals for the Delta established in the Delta Reform Act. That Act establishes co-equal goals of providing a more reliable water supply and protecting, restoring and enhancing the Delta ecosystem in a manner that protects and enhances the unique values of the Delta. See Cal. Water Code § 85054. In contrast, the purpose and objectives in the NOP omits any consideration of ecosystem health and restoration, impacts to Delta communities. Such an approach is inconsistent with the Delta Reform Act, and the project purpose and objectives should be revised to incorporate restoration of the Bay-Delta ecosystem as a co-equal purpose to improving the physical reliability of the water delivery system.
662	John McManus Golden Gate Salmon Association	Finally, the purpose statement and objectives in the NOP are inconsistent with the Newsom Administration's public statements regarding Delta conveyance. For instance, the Governor's 2019 State of State speech emphasized that in addition to protecting water supply, a single Delta tunnel project must also "preserve Delta fisheries," and that conveyance must be part of a portfolio with water recycling and water conservation. Similarly, the draft Water Resilience Portfolio Report (Recommendation 19.1) emphasized that a Delta tunnel must "protect water quality," "support ecosystem restoration," and "limit local impacts." The purpose and objectives in the NOP wholly omit any consideration of these essential attributes of a sustainable project.
662	John McManus Golden Gate Salmon Association	We therefore urge DWR to significantly revise the purpose and objectives of Delta conveyance to eliminate any suggestion that the project's purpose is to increase water diversions from the Delta, to explicitly require reduced reliance on the Delta and investments in local and regional water supply projects as part of a true portfolio, and to incorporate protection and restoration of the Bay-Delta ecosystem as a co-equal purpose of the project.

662	John McManus Golden Gate Salmon Association	CEQA requires that an environmental impact report analyze a reasonable range of alternatives to the proposed project, including a no project alternative. Cal. Pub. Res. Code §§ 21002, 21061, 21100; tit. 14, Cal. Code Regs. § 15126.6. Here, a reasonable range of alternatives must include not only one or more alternatives that reduce diversions from the Delta, but also one or more alternatives that include a single Delta tunnel as part of a portfolio of local and regional water supply investments. However, language in the NOP does not appear to consider alternatives that reduce diversions from the Delta and fails to include new conveyance as part of an enforceable portfolio of local and regional water supply projects.
662	John McManus Golden Gate Salmon Association	First, because the purpose and objectives of a project define what alternatives are reasonable, id. at § 15126.6(a), as discussed supra it is essential that the State revise the NOP's purpose and objectives to ensure consideration of alternatives that significantly reduce diversions from the Bay-Delta as needed to comply with state and federal laws. Here, the NOP identifies a range of alternatives based on size of new conveyance (from 3,000 to 7,000 cfs), but it does not identify a range of operational criteria. Instead, it suggests that the alternatives would "increase DWR's ability to capture water during high flow events" without also reducing DWR's diversion of water during normal and drier water year types, and that it would identify "initial operating criteria" rather than a range of operational criteria. While it is true that the Supreme Court in 2008 upheld the final EIR for the CALFED program despite the fact that the document did not consider a reduced export alternative, In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings, 43 Cal. 4th 1143, 1168 (2008), changes in state law and the best available scientific information demonstrate that a EIR for this project must consider alternatives that reduce diversions from the Bay-Delta. For instance, the subsequent enactment of the Delta Reform Act now makes ecosystem restoration a co-equal purpose with improving water supply reliability and establishes state policy to reduce reliance on the Delta. Similarly, the best available science regarding the effects of climate change and ecosystem restoration demonstrate that reduced water diversions are needed to meet water quality standards and comply with state and federal endangered species acts. As a result, the EIR for this project must consider alternatives that result in reduced diversions from the Delta, even as the physical reliability of the system may be improved with new conveyance.
662	John McManus Golden Gate Salmon Association	Pages 10-11 of the NOP inaccurately describes the BDCP/WaterFix EIS/EIR process, because it fails to acknowledge that DWR withdrew its Notice of Determination and withdrew certification of the final EIR. See DWR, Rescission of Notice of Determination (NOD) – State Clearinghouse Number – 2008032062, May 2, 2019.4 The NOP properly acknowledges that the "proposed Delta Conveyance Project is a new project and is not supplemental to these past efforts or tiered from previous environmental compliance documents." (emphasis added). DWR must ensure that the DEIR does not tier to the fundamentally flawed final EIR for the California WaterFix/BDCP project.

662	John McManus Golden Gate Salmon Association	GGSA is concerned that the approach to the Delta Conveyance Project and environmental analysis described in the NOP is significantly flawed. Those concerns are heightened by DWR's recent deeply flawed DEIR for Operations of the State Water Project, and by the continuing delay of the State Water Resources Control Board's update of the Bay-Delta Water Quality Control Plan. Before the State and public considers a new Delta Conveyance Project or other major water storage and diversion projects that are likely to significantly worsen environmental conditions in the Delta, the State Water Resources Control Board should first establish updated flow and water quality standards that will achieve salmon doubling, prevent extinction, and protect and restore native fish and wildlife and the health of the Bay-Delta watershed. GGSA strongly encourages the Natural Resources Agency to reconsider the approach identified in the NOP, consistent with these comments.
675	Terrie Mitchell Sacramento Regional County Sanitation District	The Delta Conveyance Project objectives (NOP, p. 2.) are too narrowly defined, focusing only on benefits to State Water Project operations and south of Delta water deliveries. The objectives reference providing "operational flexibility to improve aquatic conditions in the Delta", yet the Project does not commit to improving aquatic conditions, nor does it include any objectives that would protect water quality in the Delta from degradation. Framing Delta Conveyance Project objectives so narrowly could discourage consideration of alternatives to the Project that would protect and restore the Delta environment. This approach is not only inconsistent with CEQA, but it is also inconsistent with the Delta Reform Act's coequal goals of improving water supply reliability and protecting, restoring, and enhancing the Delta ecosystem. Regional San believes the Delta Conveyance Project objectives should be expanded to include prevention of water quality degradation in the Delta and avoidance of adverse impacts to Delta public facilities (which would include the SRWTP), which is consistent with the Delta Plan.
683	Jeff McCormack Reclamation District 1002	RD 1002 includes most of the area on your satellite photo maps labelled "Lambert Maintenance Shaft" and "Glanville Tract Launch Shaft Site." (2 "n"s in Glannville, named after Peter Glann, original owner.) (Also, on left margin, midway down, "Granville" with that "r" instead of "l" is wrong.) The Glannville Tract Launch Shaft map label, "McCormack Williamson Tract" is for the tract off the bottom of that map, whose North edge barely shows on the photo, on the south side of Lost Slough. An arrow pointing to that sliver south of the levee should be inserted. In contrast, John McCormack Co.'s "Glannvale" Ranch orchards are on the North side of Lost Slough under your label reading, "Williamson." More specifically, they are under the "R" in McCormack. Likewise, the Thomas McCormack Co.'s vineyards are under the "mack" part of the label, and under the label, "CR-13 – Twin Cities Rd." Mello Brothers' orchards, also on the North side of Lost Slough, is above the proposed tunnel, east of the poplar tree road, where the road heading South from Twin Cities Rd. goes South. This distinction is important because the McCormack-Williamson Tract (MWT) is co-owned by DWR and The Nature Conservancy (TNC). It is a different reclamation district.

694	Delta Counties Coalition	The NOP fails to provide the minimum information for the DCC and the public to understand the Project. A NOP must include: (A) Description of the project; (B) Location of the project "either by street address and cross street . . . or by attaching a specific map"; and (C) Probable environmental effects of the project.(CEQA Guidelines section 15082, subd. (a)(1).) In all three areas, the NOP falls short of providing the required information.
694	Delta Counties Coalition	The NOP fails to include an adequate Project description. This massive project spans multiple counties and yet the NOP merely lists major project components without ever describing them. To the extent any details are provided, they are expressed in ranges or are completely uncertain. The intake footprints, for instance, are described as a range from "75 to 150 acres" (NOP, p. 5), a 100 percent difference. Moreover, the NOP even qualifies that range with the word "could". Three intake locations are identified with dots on the map, and the NOP states two of them will be selected. Two potential tunnel corridors are shown in wide swaths without any exact location. These approximations fail to provide a description of all Project components to which the public can respond.
694	Delta Counties Coalition	Inclusion of the "Central Tunnel Corridor" option in the NOP is also questionable, as it was deemed infeasible by the Independent Technical Review ("ITR") Committee, an independent panel of expert tunnel engineers convened by the Delta Conveyance Design and Construction Authority ("DCA"), in December 2019. The Panel found that "the Central Corridor is logistically impractical," hindered by numerous waterways and only having access via farm roads to transfer materials and labor, in addition to safety and costing concerns. The DCC concurs with the ITR that the unique geography of the Delta and the massive disturbance necessary to construct this Project option are incompatible. The ITR Panel's recommendations should not be discounted.
694	Delta Counties Coalition	The NOP's description of proposed project facilities is also too vague to determine whether the Project would advance the identified Project objectives. For example, the Project seeks to address "anticipated rising sea levels" as well as to provide "operational flexibility to improve aquatic conditions." (NOP, p. 2.) Yet the ensuing description never mentions either objective or explains how the proposed facilities would help achieve them. With respect to the objective associated with protecting water deliveries from the impacts of a major earthquake, the DCA's ITR Panel noted that no active fault crossings exist along the Delta Conveyance alignment. This conclusion indicates that a tunnel may not be not needed to "minimize[e]the potential for public health and safety impacts ... resulting from a major earthquake." (NOP, p. 2.) The ITR's observation that no active fault crossings exist along the Delta Conveyance alignment undermines the oft-repeated rationale that construction of a tunnel in the Delta is necessary to prevent water supply disruptions from earthquakes.3

694	Delta Counties Coalition	In addition, the NOP fails to provide any information regarding the proposed operation of the Project. Without a description of proposed Project operations, it is not possible to provide input on the analysis of Project operations. Based on the prior environmental review of the WaterFix, the DCC is concerned that the draft EIR for the Project will similarly defer proposed operations to later regulatory processes and rely on model runs that continually change. Clear operational proposals in various water conditions (e.g., wet, above average, average, below average and dry years) would be necessary to conduct a complete environmental analysis of the Project. This should include how triggers will be set to establish the applicable operations in each foreseeable hydrologic condition. The governance approach to operations should also be defined, in order to analyze reasonably foreseeable impacts on local water supplies, water quality and other resources.
694	Delta Counties Coalition	A street address or a specific map of the Project location is required. (CEQA Guidelines,§ 15082, subd. (a)(1)(B).) The NOP vastly falls short in this regard, providing neither addresses for intakes, corridors or any of the associated facilities. The map provided with the NOP as "Figure 1" is not "specific" and the identified areas are described as still "under consideration." (NOP, p. 3.) Figure 1 states that "Only Two[of three]Sites will be Selected," however, two entirely different sites other than the three depicted could be chosen for the intakes. Figure 1 also identified two different tunnel corridors, which would impact different land and water areas. No support facilities, such as batch plants, fueling stations and construction staging areas are identified by address or by map. The NOP also fails to define the Project area in a meaningful way, generally listing upstream of the Delta, the Delta and south of Delta service areas. The NOP defers identification of the study areas for each resource, stating that "The study areas will be specifically defined for each resource area evaluated in the EIR." (NOP, p. 6.)As a Project with statewide implications, the study areas should be clearly defined at the outset so the public can understand the intended approach to analysis in the Draft EIR. zoning code approvals and permits may be necessary. Construction in conflict with prevailing land uses in
694	Delta Counties Coalition	From the NOP, it is also unclear within which Delta counties DWR proposes to conduct Project activities. If activities are planned in DCC counties, discretionary county Project areas would require conditional use permits, special development permits, variances, rezones, code text amendments and/or master plan amendments. Counties also have approval authority over geotechnical exploratory drilling, boring and construction of wells, road and highway encroachment permits, building permits, and other local permits. The NOP should be revised to reflect these areas of jurisdictional authority.
694	Delta Counties Coalition	In short, the scope of the Project is massive and would have significant environmental impacts in all of the Delta counties. Much more location detail is necessary for any county or agency to make a meaningful response and analyze the potential significant impacts to areas within their jurisdictions.

701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR has improperly curtailed its project purpose, in contravention of CEQA. The purpose has been narrowed from the broad and balanced purposes of the previous iterations of the Project, which correctly characterized DWR's responsibility under the Delta Reform Act to restore "ecosystem health" and "water quality". By drawing the Project's purpose so narrowly – to construct new conveyance to restore water deliveries, but not ecosystem health and water quality – DWR has fatally tainted the EIR process in at least four respects. DWR has abandoned its prior commitment to restore and protect ecosystem health and water quality. In doing so, DWR ignores the mandates of the Delta Reform Act. By limiting the Project's purpose to restoring water deliveries, DWR has abruptly dispensed with any pretense that it seeks to protect the Delta ecosystem, and indeed, the very water quality on which the SWP's water deliveries depend. DWR has created a false narrative that water deliveries need restoration. DWR misleads the public by claiming that the range of alternatives it plans to study in detail in the Draft EIR will address preliminary locations, corridors, capacities, and operations, with varying degrees of involvement of the CVP. The NOP makes clear each of these options will focus instead on building yet another new conveyance designed solely to attain DWR's impermissibly narrow and unattainable Project purpose. DWR must broaden the NOP's improperly narrow purpose to reflect the overarching need and statutory command to restore the Delta's ecosystem health and water quality. The Draft EIR must study a reasonable range of alternatives that can satisfy these statutory mandates. This reasonable range of alternatives must include non-conveyance alternatives, such as increased water efficiencies, rationing, increased local reliance, and other sources of water for SWP users. DWR must also consider an alternative that reduces water exports from the Delta – an action that is necessary to restore the Delta ecosystem's health and water quality.
706	Shelley Ostrowski Westlands Water District	The District requests that DWR work with the United States Bureau of Reclamation, the District, and other CVP contractors in developing the Proposed Project, Project alternatives, especially with regard to exploring the possibility of moving both CVP and SWP water through the conveyance facilities, the impact analyses, and formulation of mitigation measures. Further, because of the potential for the District to rely upon the EIR to support discretionary decisions concerning the Proposed Project, the District should be identified in the EIR as a Responsible Agency.
715	Daniel Wilson Reclamation District 3	The assumptions used to develop the project objective of protecting against water supply disruptions due to a major earthquake in the Delta seemingly do not consider updated levee data and recent studies that reflect a lower probability of flooding due to an earthquake event. The objective must be re-evaluated based on the actuarial risk of extensive flooding from a seismic event causing disruptions to water supplies.
724	Harvey Correia Reclamation District 2067	The assumptions used to develop the project objective of protecting against water supply disruptions due to a major earthquake in the Delta seemingly do not consider updated levee data and recent studies that reflect a lower probability of flooding due to an earthquake event. The objective must be re-evaluated based on the actuarial risk of extensive flooding from a seismic event causing disruptions to water supplies.

730	Reclamation District 551	The assumptions used to develop the project objective of protecting against water supply disruptions due to a major earthquake in the Delta seemingly do not consider updated levee data and recent studies that reflect a lower probability of flooding due to an earthquake event. The objective must be re-evaluated based on the actuarial risk of extensive flooding from a seismic event causing disruptions to water supplies.
735	Regina Cuellar Shingle Springs Band of Miwok Indians	The January 15, 2020 Notice of Preparation appears to be focused on physical alternatives to maximize water deliveries for consumptive purposes south of the Delta while largely ignoring environmental impacts of the coordinated operations with the Central Valley Project ("CVP"). However, one of the essential purposes of the CVP, as approved by Congress, is to mitigate, restore, preserve, and propagate fish and wildlife. Central Valley Project Improvement Act Section 3406(a). Consequently, the description of the purpose of the proposal as well as subordinate objectives must also include protection of fisheries, particularly those in the Trinity and Klamath rivers, from which much of the water comes. To ensure full disclosure of environmental impacts, inclusion of fisheries protection to the EIR statement of purpose is required as a benchmark against which EIR alternatives will be measured.
736	Kelley Taber County of Sacramento	The Project objectives (NOP, p. 2.) are too narrowly drawn, focusing only on benefits to State Water Project (SWP) operations and south of Delta water deliveries. The objectives reference providing "operational flexibility to improve aquatic conditions in the Delta" but the Project does not commit to improving aquatic conditions, nor does it include any objectives that would protect water supplies for water users in and upstream of the Delta. Framing Project objectives so narrowly could discourage consideration of alternatives to the Project that would protect and restore the Delta environment and thus are inconsistent with CEQA as well as with the Delta Reform Act's co-equal goals of improving water supply reliability and protecting, restoring, and enhancing the Delta ecosystem. The Project objectives also should be expanded to include a specific objective to protect and enhance the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place, which is one of the Legislature's directives for achievement of the "co-equal goals." Finally, the Project objectives should be expanded to include prevention of water quality degradation in the Delta and avoidance of adverse impacts to water users in and north of the Delta, including impacts to Delta public facilities (which would include the SRWTP and FRWP) and Delta surface and groundwater users, consistent with the Delta Plan.
744	Shivaji Deshmukh Inland Empire Utilities Agency	The lower salinity imported water from the State Water Project actually makes our regional recycled water program possible. Absent the availability of imported water, our recycled water supplies would exceed NPDES permit limits, rendering locally developed supplies unusable; it will also lead to potential exceedances of Chino Basin water quality objectives, further hindering groundwater recharge programs. To date, the Chino Basin region has used over 350,000 AF in recycled water. The recharge of recycled water is possible only with the contiguous recharge of high-quality water with low TDS such as imported water, as depicted in the chart above.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The Draft EIR must have a much larger scope than is set forth in the NOP. A foundational deficiency is the apparent intention evidenced by the NOP to violate the CEQA requirement to set forth a range of reasonable alternatives to the project and evaluate comparative merits of the alternatives.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	DWR Must Disclose and Assess the future Reduction in Claimed Needs for the Project as a result of New Technologies and Curtailed Exports Paragraph 3 of Executive Order N-10-19 requires any water resilience portfolio adopted by state agencies to embody the following principles, inter alia: "Utilize natural infrastructure such as forests and floodplains" (¶ 3(b); "Embrace innovation and new technologies" (¶ 3(c); and "Incorporate successful approaches from other parts of the world." (¶ 3) (e.)" This type of information should be assessed and evaluated prior to developing the Project as it would be invaluable in understanding, and likely lessening, the claimed need for the proposed project.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Understanding the degree of need, if any, for the Project is pertinent information that the Draft EIR must fully assess. In the absence of a full understanding, the Draft EIR would simply be a stacking of the deck in favor of the Tunnel Project and prevent a fair, adequate comparative analysis of it with through Delta conveyance alternatives not including a tunnel.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	DWR's NOP notice (https://water.ca.gov/Programs/State-Water-Project/DeltaConveyance/Environmental-Planning), Modernizing Delta conveyance is part of the state's Water Resilience Portfolio, which describes the framework to address California's water challenges and support long-term water resilience and ecosystem health." (Emphasis added). The NOP notice informs the public that the project is about water supply resilience and ecosystem health. The NOP Project Purpose conspicuously and deceptively in conflict with the notice, leaves out any reference to "ecosystem heath". The word "ecosystem" is not included in the NOP even once, but ecosystem health is represented as a coequal goal in the NOP notice. This is glaringly inconsistent and misleading. Health of the environment and watersheds are specified as objectives of the Water Resilience Portfolio. Neither of these objectives are included in the NOP; "ecosystem health", "environmental health" and "watershed health" must be added to the Delta Conveyance Project objectives so that it is consistent with the NOP Notice and the mandates of EO N-10-19.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Purpose and Project Objectives, paragraph 1, "Under CEQA, [a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives ... " Correct, CEQA requires a clearly written statement of objectives. Unfortunately what this NOP provides is a poorly written conflation of "Purpose" and "Objectives" which confounds the CEQA requirement for clarity in defining project objectives to use to develop a reasonable range of alternatives. To support discussion of our following comments regarding how this NOP section fails to meet the requirement for clearly written project objectives, here are the definitions of "Objective" vs. "Purpose". Objective" definition: something that one's efforts or actions are intended to attain or accomplish11 • Purpose" definition: "the reason for which something exists or is done, made, used, etc. The word "reason is the key here. Anything that is not a reason for doing a project does not belong in the Purpose Statement. Anything that is a reason does not belong in the section describing the Project Objective. These are essential to clarify as they are the basis for the project alternatives screening criteria. This section of the NOP must be rewritten to comply with the CEQA legal requirement for clarity which it currently fails to do.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Purpose and Project Objectives, paragraph 2, " .. . purpose in proposing the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) water deliveries ... " Again, this is poorly written, not clear, and conflates purpose and objective which must remain clearly defined to support development of alternatives per CEQA requirements. The first part, "develop new diversion and conveyance facilities" is an objective. The second part, "to restore and protect the reliability of SWP water deliveries" is a purpose (reason) for the project. It is important to separate the two concepts distinctly as the objective is how the project proponent conceives achieving a project purpose.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	"Restore ... SWP water deliveries" (NOP page 2, paragraph 2) as a Project Purpose declares the intent to increase reliance upon delta water supplies, which is in direct violation of the legal requirement of SB-X7. Alternatives and alternative components identified in these comments are compliant with SB-X7. The term "restore" is not defined and therefore is not meaningful as a definition of a project purpose. Restore the water supply to what quantity or what period? Does this mean restore water supplies to unimpaired flows from current hydrology 1921-present (the "hydrologic record"), pre-SWP development, pre-D1641, to D1641 standards, pre-Wanger or post-Wanger rulings, Oroville FERG Relicensing pre- or post-, yesterday? If the term "restore" is kept as part of the project purpose it must be defined or alternative concepts cannot be reasonably evaluated for how well they meet this project purpose. Once the restored water supply objective is quantified, it must be disclosed in a revised NOP as it is fundamental to understanding the scope of the project and potential impacts that are important to the public.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Purpose and Project Objectives, paragraph 2, "DWR's ... purpose in proposing the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of ... potentially, Central Valley Project (CVP) water deliveries south of the Delta ... " The stated purpose now also, potentially, is to restore and protect the water supply of a Federal Agency that has to this date not indicated an interest in participating in the project. It is not a CEQA project purpose (reason) for a state to propose a project for a federal agency. This project objective must be withdrawn from the NOP as it is not a viable objective for the state and must not be utilized as any component of a screening criteria for alternatives development.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Purpose and Project Objectives, paragraph 2, " ... consistent with the State's Water Resilience Portfolio." Yes, if the project is authorized by EO N-10-19 (it isn't - see EO Comments), then it must be consistent with it. The CEQA Project Purpose as stated in this paragraph is not consistent with EO N-10-19. The words "restore and protect the reliability of SWP water deliveries" or even combinations of those words is not anywhere in the EO. DWR's proposed "project purpose" is made up, whole cloth, and is not from or consistent with the EO. An essential part of consistency with the EO's Water Resilience Portfolio is the project must include all of the objectives, requirements and principles required and identified by EO N-10-19. The Delta Conveyance Project as proposed in this NOP does not include or meet the objectives and mandates of the EO.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Purpose and Project Objectives, paragraph 3, "The above stated purpose, in turn, gives rise to several project objectives." DWR has this exactly backwards here. In the statement above DWR refers mostly to the objective (see previous comments), "to develop a new diversion and conveyance in the Delta". 11Objective" definition: 11something that one's efforts or actions are intended to attain or accomplish11 • In other words the objective is, "we want to build something that does this, that and the other thing". Anything that is not a reason does not belong in the purpose statement. The project objectives drive the purpose, not the other way around. DWR's NOP would not be so confused if the Project Purpose was clearly written as CEQA requires. All 4 bullets in the NOP that follow are all "reasons" (purpose) for a project, not objectives. Any alternative that reasonably satisfies accomplishes these reasons for a project must be included in the EIR analysis as viable alternatives.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Purpose and Project Objectives, paragraph 3, "In proposing to make physical improvements to the SWP Delta conveyance system, the project objectives are:" This is a good example of how DWR has gotten purpose and objectives backwards. If DWR does not straighten out this fundamental flaw and CEQA requirement failure, the screening criteria for alternatives development with be equally flawed and the evaluation of alternatives incorrect and indefensible.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The State has adopted climate change assumption standards that all new projects must adhere to. Although we do not agree with these climate change assumptions or standards, it was imperative for the NOP to disclose the standard that this project purpose sets in order for the public to understand the project proposed as well as potential alternatives to the project. The sea level rise assumption in the Delta Conveyance Project is reportedly 1 O feet, but it is not disclosed in the NOP. This is a wildly alarming assumption that has far reaching implications to the communities in the Delta and other non-SWP water supply customers that get their water from the Delta. All water supply diversions in the Delta are vulnerable to a sea level rise of 1 O feet, but the Delta Conveyance Project only proposes to protect those Californian's that are served by the SWP. By withholding the sea level rise assumption of 10 feet from the public in the NOP, the public has been denied their opportunity to understand the scope, implications and potential alternatives of and to the project. The NOP must be reissued to include this fundamental assumption and criteria for the purported purpose of the project. The scope and expectations of the project must be revised to address the needs and threats to water supplies of all Californian's, not just SWP customers.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Purpose and Project Objectives, paragraph 3, fourth bullet, "To provide operational flexibility to improve aquatic conditions in the Delta and better manage risks of further regulatory constraints on project operations." "Aquatic conditions" is too vague a term to be useful in evaluating if a project alternative meets this objective or not. The project alternative scoping screening criteria for this objective must be changed to "protect delta water quality and habitat values for delta residents, water users and wildlife" so that it is consistent with the EO and SB-X7 legal requirements.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 3, paragraph 3, "DWR would operate the proposed north Delta facilities and the existing south Delta facilities in compliance with all state and federal regulatory requirements and would not reduce DWR's current ability to meet standards in the Delta to protect biological resources and water quality for beneficial uses." SWP operations routinely violate water quality standards in the Delta. DWR is saying here that it is planning to build a facility that is intended to violate the law at the same frequency as the current facility. The new facility and operations must plan to be compliant with the law to protect water quality and wildlife habitat or it cannot be permitted.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 3, paragraph 3, "Although initial operating criteria of the proposed project would be formulated during the preparation of the upcoming Draft EIR in order to assess potential environmental impacts and mitigation, final project operations would be determined after completion of the CEQA process ... " (emphasis added) In this statement, DWR has declared its intent to violate CEQA law. CEQA requires that all environmental impacts of a project be disclosed, analyzed and mitigated and that agencies that rely upon the EIR for decisions based upon the EIR for permit issuance will be inaccurately and misinformed. This statement of intent to violate CEQA is so serious that we request all staff or contractors involved in this proposed decision to violate CEQA law and mislead agencies which rely upon this document be immediately removed from the project and reprimanded in the case of DWR staff or terminated in the case of contractors. This DWR plan to violate CEQA by not analyzing, disclosing or mitigating the true operations-related impacts in the EIR fundamentally violates the responsibilities of the CEQA Lead Agency to the point of malfeasance. If, after the CEQA process is completed, proposed operations of the Delta Conveyance are modified in any way from those analyzed, disclosed and mitigated in the EIR, a supplemental EIR must be conducted prior to any consideration of issuance of construction- or operations-related permits by any agency.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR must thoroughly explain why a tunnel is necessary to address sea level rise if DWR will at all times maintain adequate Delta water quality in the wake of that rise (including adequate water quality at its southern Delta intakes).
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Assuming, on the other hand, that it is DWR's plan to use the project to abandon the maintenance of adequate Delta water quality in the wake of sea level rise: (c) The EIR must conduct a thorough and detailed analysis of the water quality that will result throughout the Delta under all reasonably foreseeable sea level rise scenarios after DWR abandons the maintenance of adequate Delta water quality, and conduct a thorough and detailed analysis of the entire range of potentially significant adverse impacts to all aspects of the environment, public health, other water users (including the CVP export contractors if they do not participate in the use of the tunnel), etc. from that abandonment.

767	Kelly Taber City of Stockton	The Project objectives (NOP, p. 2.) are too narrowly drawn, focusing only on benefits to State Water Project (SWP) operations and south of Delta water deliveries. The objectives reference providing "operational flexibility to improve aquatic conditions in the Delta," but the Project does not commit to improving aquatic conditions, nor does it include any objectives that would protect water quality in the Delta from degradation or protect water supplies for in-delta municipal water users. Framing Project objectives so narrowly could discourage consideration of alternatives to the Project that would protect and restore the Delta environment. The proposed objectives thus are inconsistent with the California Environmental Quality Act (CEQA) as well as with the Delta Reform Act's coequal goals of improving water supply reliability and protecting, restoring, and enhancing the Delta ecosystem, as well as the Legislature's directive that "coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place." The Project objectives should be expanded to include prevention of water quality degradation in the Delta and avoidance of adverse impacts to Delta water supplies, consistent with these authorities.
767	Kelly Taber City of Stockton	The Project objectives also should reflect the need for continued use of the existing South Delta pumps, and the critical importance of maintaining existing through-Delta conveyance. "Modernizing conveyance," therefore, must not be limited to a new tunnel, but also prioritize rehabilitation of existing Delta levees. The seismic threat cited by tunnel proponents as justifying a new North Delta conveyance presents an even more significant threat to the water supply, health, and safety of Delta residents, as well as proposed tunnel infrastructure located throughout the Delta. Yet, the Project description does not include any objectives or actions related to Delta levee investment and improvement. It should.
767	Kelly Taber City of Stockton	So far, the State has proposed only minimal investment in levee upgrades through the current draft budget, while proposing to commit many billions of dollars to the Project. Delta levee investment and rehabilitation in the Project description would serve Project objectives as well as the Delta Reform Act's mandate to improve water supply reliability for the state (not just Delta exporters). Including Delta levee rehabilitation as part of the Project also would demonstrate that assertions by the Newsom Administration and Delta Conveyance Design and Construction Authority that Project proponents seek to include multi-benefit projects as part of the Project are not mere lip service to Delta interests. If the Project description is not revised to include significant rehabilitation of Delta levees, the EIR must evaluate and disclose the potential for the Project to lead to reduced investment in Delta levee maintenance (though redirection of funds that would otherwise have been spent in support of SWP and Central Valley Project (CVP) through-Delta conveyance), and the likely environmental consequences of this reasonably foreseeable Project effect in terms of increased risk to human health and property in the Delta as well.

783	Mark Miyoshi Winnemem Wintu Tribe	The purpose and objectives of the Project appear reasonable and well meaning but the complete absence of support for the ecosystems of the Delta and the whole of the Sacramento and Trinity River watersheds can only mean that these life systems are to be sacrificed. The non-committal references to the Central Valley Project (CVP) indicate that the Project is being developed to service the CVP without a transparent discussion of objectives and operations of the Project. The role of the CVP must be explicitly stated in the EIR.
796	Byron Nelson, Jr. Hoopa Valley Tribe	Modification of Coordinated SWP-CVP Operations Must Fully Account For, Develop, and Implement Necessary Measures for Mitigation, Restoration, Preservation, and Propagation of the Affected Fish Species, Habitat, and Indian Trust Assets. The January 15, 2020 Notice of Preparation appears to be focused on physical alternatives to maximize water deliveries for consumptive purposes south of the Delta while largely ignoring environmental impacts of the coordinated operations with the CVP. However, one of the essential purposes of the CVP, as approved by Congress, is to mitigate, restore, preserve, and propagate fish and wildlife. CVPIA Section 3406(a). Consequently, the description of the purpose of the proposal as well as subordinate objectives must also include protection of fisheries, including those in the Trinity and Klamath rivers, for which the State of California is responsible. To ensure full disclosure of environmental impacts, inclusion of fisheries protection to the EIR statement of purpose is required as a benchmark against which EIR alternatives will be measured.
829	Sherri Norris California Indian Environmental Alliance	The Conveyance Project is stated to be a solution to protect the public from threats to surface water supply from flood, subsidence, earthquake, and climate change. There is inconsistency between the asserted need for the Project due to fault line and systemic activity along the current Delta Conveyance infrastructure. However, in the Delta Conveyance Design and Construction Authority's Internal Technical Review Panel Memorandum distributed on February 20, 2020 the existing infrastructure is not threatened because "The precast lining is sufficient to support the anticipated loads including seismic events...There are no active fault crossings along the [existing] Delta Conveyance alignment and the current seismic demands are not extreme compared to other projects." Therefore, the proposed project is unnecessary because the current system is sufficient if not better than the proposed project is. Regarding existing infrastructure instead of creating a new Project, why are we not working to update and protect our current levee-supported conveyance infrastructure in the Delta? The Water Resiliency Plan does acknowledge the careful balance between beneficial uses. We recommended that the short list included in the Plan and any subsequent Projects such as the Delta Conveyance Project also take the state's two new tribal Beneficial Uses into consideration. These definitions adopted by the State Water Resources Control Board (SWRCB) in 2017, include "Tribal Subsistence Fish Consumption," and "Tribal Cultural Uses." The Water Resiliency Plan and the Delta Conveyance Project should also take into consideration "commercial and sports fishing," "subsistence fishing" for the general public, and the "human right to water." These specific uses are really important to any local, regional or statewide planning document, and should be included in the document every place where beneficial uses are mentioned.

829	Sherri Norris California Indian Environmental Alliance	We do see in the Notice of Preparation that DWR states that under CEQA Guidelines that the EIS will explore significant environmental issues, reasonable alternatives and mitigation measures. The notice qualifies this stating that an "EIR need not consider every conceivable alternative to a project." We disagree this project is massive, costly and will result in unmitigatable environmental impacts. We assert that the EIR should not be developed until the state has not definitively made the case that the project is required to meet state needs, that there are no alternatives, and that environmental and cultural impacts can be avoided to the satisfaction of impacted Tribes and the public in the sources, footprint area and receiving waters of the Sacramento/Northern Sierra-Nevada watershed.
880	Muriel Strand	10. Will the decision be based on ecological health or financial profit?

Table D-4. General Comments and Comments in Support or Opposition to the Proposed Project

Letter	Commenter Name, Affiliation	Comment Text
1	Dee Joyce	I have never been in support of any type of peripheral canal proposal to ship more needed Delta water to south of its origination. I voted against it. And now, in the past few years we are having to battle against it under different names. Twin Tunnels/Delta Conveyance. The first Governor Brown irreparably damaged California water management by looking to the easy solution without any environmental considerations. And we, the fish and mammals in the North, and the humans in the backyard of the Delta, have been having to fight to try to regain our lives.
3	Bruce Channing Association of California Cities-Orange County	On behalf, of the ACC-OC Board of Directors and Executive Director, I am writing to express our support for the Delta Conveyance Project. Our region depends on a reliable system that is efficient and cost effective.
4	Art Herbert	Stop this. I will vote against any politician in favor of this.
5	Shoshana Bianchi-McElwee	I'm writing to express my dismay that Governor Newsom may be caving to Trump-suspect science in determining whether or not a single tunnel will suffice in the Bay Delta.
9	David Pedersen Las Virgenes Municipal Water District	The need to modernize the conveyance system through the Sacramento-San Joaquin Bay Delta has never been greater. LVMWD purchases all of its drinking water supplies from the Metropolitan Water District of Southern California, which in turn receives a significant portion of its supply from the State Water Project. As an early-adopter of water recycling, LVMWD is committed to continue its investments in the development of local water supplies. In fact, LVWMD is currently planning a $120 million potable reuse project, called the Pure Water Project Las Virgenes-Triunfo, to produce up to 20% of its water supply locally. It will likely be the first reservoir water augmentation project in Los Angeles County. However, the success of our project and others throughout Southern California depends on a reliable and high-quality supply of water from the State Water Project.
13	Michael Seaman	The Delta Tunnel project is a very bad idea that will bring benefits to a small handful of greedy people while causing dreadful harm to large numbers of Californians who depend on the Delta for their livelihood and to the critical Bay-Delta ecosystem.
13	Michael Seaman	As a taxpayer, I strongly object to the Tunnel project, its costs and the threat it brings to the Delta.

28	Anthony Duarte Regional Chamber of Commerce-San Gabriel Valley	On behalf of the Regional Chamber of Commerce San Gabriel Valley, I am pleased to provide input for the scoping process of the single-tunnel Delta conveyance project being advanced by the Department of Water Resources. We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies to much of California. More than 30 percent of Southern California's water supply comes from the Sierra Nevada and it provides the backbone water supply for millions of people, our $1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
31	Brad Rosenheim Valley Industry & Commerce Association	On behalf of the Valley Industry and Commerce Association (VICA), we are pleased to support the single-tunnel Delta conveyance project being considered by the Department of Water Resources as part of the Scoping Process. We appreciate Governor Gavin Newsom's leadership to help ensure, safe, affordable and reliable water supply to many parts of California. More than 30 percent of Southern California's water supply comes from the Sierra Nevada and it provides the backbone water supply for millions of people, our $1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies, and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.

34	Susan Armstrong	Please don't let greed and bad science alter your good judgment. No money gained from water sales to our south can be worth risking of the environment. Money will be of no use if the planet is ruined.
39	Mike Rossi	I am in favor of a single delta tunnel. This is the best way to improve the water supply quality, protect the delta, and protect California from devastating levee failure. Do it now.
61	Janice Gloe	I strongly urge you and all involved in the decision making, including Governor Newsom, to block construction of a tunnel at the Delta!
68	Cassandra Lista	I'd like to register my opposition to the proposed underground conveyance of delta water. It would be massively expensive, inefficient and have a horrendous impact on the environment. NO TUNNEL!
70	Bruce Channing ACC-OC Board of Directors	On behalf, of the ACC-OC Board of Directors and Executive Director, I am writing to express our support for the Delta Conveyance Project. Our region depends on a reliable system that is efficient and cost effective.
85	Luis Portillo Inland Empire Economic Partnership	We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now.
85	Luis Portillo Inland Empire Economic Partnership	We support the Newsom administration’s work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
87	Jaclyn Shaw	(7) WATER REDISTRIBUTION is Socialism? Governor Pardee learned of Water redistribution or socialism in a trip to Germany. It seems like bureaucratic blinders and snow jobs of expensive, time consuming paperwork? Stop the Lodi, Mokelumne River Aqueduct towards Port of Oakland. Informed state voters were against this about 1982!
90	Jeri Opalk	California is a beautiful state with many natural treasures, we need to preserve these for future generations rather than destroy them. Adequate water flows through the Delta are a significant part of that preservation.
101	Lesley Stansfield	Don't doom the long term health of the Delta with a single tunnel. No tunnels!
106	Victoria Tatum Wilson	Please stop wasting money on endless studies and presentations of an idea that was initiated decades ago and, thankfully, still has not materialized. Do not kill the Delta for the sake of big ag in the south Central Valley, where the ground is subsiding by 20 feet due to overdrawing of the aquifers, and where because more almonds are being grown than we can possibly eat in this country, they are being shipped to China.
107	Betsy Wilde	I hereby formally join my voice with the voices of California’s North state Communities as well as the Yurok, Karuk and Hupa tribes who oppose the California Water Portfolio which includes the Delta Tunnel project.

114	John Hayward Nor Rel Muk Wintu Nation	The Nor Rel Muk Wintu Nation is strongly opposed to the proposed infrastructure in the Sacramento-San Joaquin Delta, otherwise known as Delta Conveyance Project. The Nor Rel Muk Wintu Nation will be in attendance at the meeting in Redding, Ca scheduled for March 2, 2020 at 6pm.
115	Susan Simpson	How many times will we have to fight this same fight? Diverting clean water from the Sacramento River will destroy an already fragile ecosystem. Too much money, too much destruction, too much hardship. Please end this conspiracy against the California Delta.
119	Mary Leslie Los Angeles Business Council	On behalf of the Los Angeles Business Council and our membership of over 500 businesses, I would like to express our support for the Delta Conveyance project. This important project ensures our region's supply clean water and water infrastructure is modernized, climate resilient, and responsive to the growth of Southern California.
128	Nancy Kuykendall	I am writing to ask this plan be canceled.
129	Californians for Water Security	Our growing coalition of citizens, labor unions, family farmers, businesses, local governments, water agencies, community groups and minority advocates strongly support the state's proposed Delta Conveyance Project.
137	Ellen Koivisto	I want to state my strong, unequivocal opposition to the Delta Tunnel, and to any shipping of water from the Delta out of the hydrosphere where it belongs to other locations, municipalities, ecosystems, and commercial customers in California and elsewhere.
140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	Based on current efforts of state agencies, there is a disproportionate level of effort being put towards the Delta Conveyance Project's Scoping and Environmental Impact Report (EIR) process, as opposed to water use efficiency implementation, which is putting the proverbial cart before the horse. DWD opposes the Delta Conveyance Project.
141	Patricia Cheney	The current proposal of one tunnel will further damage the environment ruining it for all time. I am completely against this engineering nightmare as a solution to California's water problems.
150	Colin Diaz Westside Council of Chambers of Commerce	We support the Newsom Administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
154	Jacklyn Shaw	A 1page size map showing Terminous tunnel plan was handed to Lodinews.com , but where is the news on impact? Last year, a photo was taken of Woodbridge Dam. It suggested looking at all the dam water, not the trickling Mokelumne River to Lodi Lake or the Aquifer, in critical water storage. Some solutions suggested were that locals would dynamite a Terminous tunnel. Another was to pull a glacier from Alaska. Generational jobs in agri-industry and tourism are at stake, with fresh food crops, not just jobs in destruction or higher taxes displacing growers and farmers in the #1 agriculture economy for San Joaquin County.

156	Donna Sharee	I would like to add my voice to the opposition to the plan for a tunnel that would divert water from California's largest estuary. I think this would be a most misguided and prohibitively expensive project for the whole state of California's people, flora, and fauna. No one would benefit but perhaps the companies building the project.
158	Don Lipari	For what it's worth, I am strongly opposed to the plan to build a single tunnel to divert Sacramento River water to the south.
158	Don Lipari	While I'm sure you're up against a well funded campaign to build the tunnel, it would lead to an environmental disaster to the Delta region and the San Francisco Bay. I know you know that. Please do what is right for the environment, not wealthy commercial interests.
169	Dennis Tapley	Remains a bad idea, no matter what it is called. California needs Mr Newsom to withdraw his support. Instead, Mr Newsom, you've got population reduction on your plat. There are too many of us.
172	Lee Johnson	No tunnel no tunnel no tunnel
175	Ian Kent	Please do not go forward with this project. It is harmful to our environment it is bad for the planets future it does not help the people who need help the most. Working Californians. It's just another project to help the rich in southern Californian get more water. Please stop the madness; this is wrong.
178	Meaghan Simpson	EVERY PROPOSAL FOR VARIOUS RENDITIONS OF THE DELTA TUNNEL PLANS... ARE TOTALLY WRONG, IMMORAL AND INSANE!!! All communities of the Delta and north of the Delta we are totally against this insane water theft for corporate farmers and people far south!!! No version of this is ever going to be wise or prudent or fair!!! Stop wasting CA taxpayers money endlessly trying to rob and rip and rape Northern California delta and our rivers communities in central and northern CA!!! The water fix bullshit must stop now!!!
187	Marci Stanage Southern California Partnership for Jobs	We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
190	Jonathan Baker	Comment opposes the project on the basis that it doesn't make sense to take water from the north if it is heading to southern California.
200	Jim Williamson	When will the government put public health in front of money?
201	Kristen Oliner Restore the Delta	The federal approval for increased pumping of water in and en route to the Delta will compound harm from this single tunnel project.
201	Kristen Oliner Restore the Delta	The science being used to justify the federal withdrawals is being questioned by large number of scientists; the science can't be trusted.

202	Daniel Hodge Recreational Boaters of California	RBOC concerns include the significant, negative impact that will occur with the closure of waterways to navigation during the lengthy construction period, the absence of a plan to ensure that the Delta infrastructure will not only be preserved but improved, and the lack of surety that the plan will address the threat that climate change and increased water transfer pose to the amount and quality of water in the Delta.
204	Raven Stevens We Advocate through Environmental Review (WATER)	The water that flows from source areas is considered a Public Trust. This means that this water must never be allowed to be sold for a profit. How will the EIR deal with "for profit" companies, like Westlands Water District, who will make decisions that only benefit their "for-profit" schemes? Westlands provides water for corporate farms. These corporations farm on arid and now polluted lands which should be pushed into retirement from agricultural production.
205	Frank Toriello We Advocate through Environmental Review (WATER)	A Westlands farmer has reported the district plans to convert most of their farmland into "solar farms" anyway. So this is about the water rights and enriching corporate interests, not about "feeding America". This is not a complicated topic – this scheme is a scam to privilege the 350 entities in the Westlands Water District with more water rights at the expense of the health and welfare of the citizens of California.
207	A Elaine Kite Bear Creek Watershed Group	Why is it called the Delta Conveyance Project when the water actually ends up in the Southern California and the Central Valley desert?
213	Dania Rose Colegrove	Oppose the tunnel and diversions
220	Stacy Sebring	I oppose the Delta Conveyance project, which will drain our rivers.
221	John Armstrong	I am opposed to a single tunnel because water will go to domestic and foreign agricultural business.
222	Jessica Lall Central City Association of Los Angeles	We believe the single tunnel conveyance capacity of 6,000 cfs is the appropriate alternative to meet California's climate resiliency, reliability, and security objectives. We request that the project move forward with intentionality and certainty.
222	Jessica Lall Central City Association of Los Angeles	Moving forward with the alternative described in the NOP will have lasting economic impact on the region by ensuring millions of Southern California residents, businesses and visitors can reliably access safe and clean water and avoid a preventable water shortage.
223	Maria Salinas Los Angeles Area Chamber of Commerce	The LA Area Chamber of Commerce supports a Delta Conveyance Project with sufficient capacity that addresses a solution that improves water security, protects against natural disasters, and keeps water affordable for residents and businesses.
224	Patricia Everall	Oppose conveyance that would drain more water from the Delta, sending it south or otherwise. Protect the environment. Save salmon and critically endangered wildlife.

227	Franz Steiner	So I ask you to end the flawed plan to supply more water to the south and to develop other ways to solve their problem. The LA basin is a huge part of this issue and at their present rate of growth, they will be need all the remaining water in the Delta within decades. They should be solving their problem now. Its time they realize they must give up all their swimming pools, baths and drinking water unless they start to plan their future. (such as photo voltaic farms to power the conversion of seawater to drinking water).
228	Allan Chan	What concerns me is if we send more water south the salinity line changes. The tunnels kill many fish, have we considered a multiple tier dam near the tunnel or a better screening system. Change is not always a good thing. I want my kids children to enjoy the Delta but it seems to me like we are killing it. I belong to CSBA and my circle of friends all hunt and fish and enjoy the delta experience. Some things that alarm me are water weeds, the decline of delta smelt, the decline of striped bass, salmon and steelhead and even crappie and bluegill.
232	Dee Saavedra	Currently proposed state and federal processes threaten California's rivers include;* The Trump Water Plan for Long Term Operations of the Central Valley Project,* Shasta Dam Enlargement,* The Long Term Operations of the State Water Project,* The Proposed Sites Reservoir,* The Twin Tunnels proposal, which is now the One Tunnel,* The Westlands Water District and other CVP water district permanent water contracts,* The Governor's Water Resilience Portfolio. This document lays out the Governor's water priorities and the one tunnel proposal and Sites Reservoir are top priorities in the document. These projects are all connected as the Sites Reservoir project and its new diversions, the Trump water plan, and the Long Term Operations of the State Water Project would allow more water to be diverted and stored from the Trinity and Sacramento River systems and Bay Delta, and the tunnel would allow this water to be moved south. The Governor's water portfolio and Trump actions make sure all of these new reservoirs and diversions are prioritized on the state and federal level above salmon and communities.
233	Michael Hazleton	I am writing in opposition to modifying the conveyance infrastructure in the Sacramento-San Joaquin Delta as pulling more water from these river systems will seriously damage the natural ecosystem that exists here. Instead, we should focus on using less water, recycling more water, and finding alternative sources (i.e. desalinate). We don't need to destroy the environment to serve water to all Californians. Please do the right thing and preserve a much natural habitat as possible using less invasive methods.
238	Randy Gordon Long Beach Area Chamber of Commerce	The Delta Conveyance Project remains vitally important. We support Governor Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.
239	Alison and Dave Boucher Tuolumne River Conservancy, Inc.	No tunnel is needed. Water should not be conveyed to unsustainable agriculture.

242	Jack O'Laughlin	Take a comprehensive look at water usage across the state and equitable treatment of smaller famers
243	Judee Kendall Glendale Chamber of Commerce	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to 6,000 cfs of water supply for the SWP will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We support Governor Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.
245	Richar Harasick Los Angeles Department of Water & Power	LADWP looks forward to a proposed project that clearly describes the impacts and benefits to participants and non-participants, clarity on regulatory permitting, outcome of operations, clarity on the risks and benefits to the CA EcoRestore program, environmental and climate change impacts and disclosure of financial and rate impacts to beneficiaries. LADWP supports and encourages the state to implement a "beneficiary-pays" funding principle for this project.
247	Jeffrey Kightlinger Metropolitan Water District of Southern California	Metropolitan agrees with the project purpose and project objectives as stated in the NOP.
250	Eileen Hupp Palos Verdes Peninsula Chamber of Commerce	We support the Newsom Administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our large and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
253	Roger Zeedik	The single tunnel review should begin with scientifically based primacy for the long term health of the Delta. Political pressure from the federal government to appease water users to the south should not be the basis for decisions to be made.
257	John Armstrong Sierra Club of California	Sierra Club is opposed to the project because of the beneficiaries who are mostly domestic and foreign aggregates in the Central Valley, and the Metropolitan Water District. Most agriculture in California is exported and that represents a huge mineral and soil water loss, a permanent loss of California resource. Metropolitan Water District has recently been saying they have more water than they need. So rather than decrease the amount that the state water project furnishes for Southern California, rather than return the water to the Delta they're planning on instituting more penalties and rate increases to maintain the status quo.
260	Todd Bloomstine Southern California Contractors Association	We support the administration's Delta Conveyance Project. Increasing the reliability is very important to SCCA as well as balancing the strong protections for the Delta ecosystem.
262	Regina Chichizole Save California Salmon	We do not support the Delta Conveyance Project. We oppose this project and any projects that will take more water out of the Sacramento, Trinity, Klamath River systems or Bay-Delta.

266	Michael DiMartino Alliance for Resilient Communities	I want people to understand that I'm opposed to no tunnel, but I want us to look at the whole region as a water shed. It's not just the Delta tunnels. It's for everything that happens from Southern Oregon, Western California, Sacramento, from Mt. Shasta to glacial waters, all the way to Sacramento, to the Delta and also what happens to the San Francisco Bay and the wetlands there.
267	Katie Donahue-Duran California State Council of Laborers	We are in strong support of Governor Newsom's Delta conveyance project. The governor and this administration recognized the need to provide water sources for the entire state. There are 39 million people in California, and our population is continuing to grow. This project will improve the reliability of our water system, fix aging infrastructure and provide water security for working families in the state. Projects of this magnitude produce high-paying jobs during the construction phase, including careers for incoming apprentices within the construction industry. There is also a domino effect of increased jobs in related industries. For these reasons, we are in support.
268	James Dunlap	The tunnel is wrong on just about every level you can think of except those that will directly make money. Whether or not you guys are strong enough to stand up to those that told you to hold this meeting and to put this conveyance forward, will be on you, you know, of whether or not the issues, the adverse effects are going to outweigh the money that's going to influence the decision, because that's basically what it's coming down to. The people in the south have no care about what goes on in the north. It's not in their yard. It's not going to affect them adversely. You know, like I say, it's just wrong on so many different options. I mean, if it's -- you're looking toward the future. You know, the Shasta Dam that was brought up was great when there was 24 million people in the state. It's obsolete now. The Trinity River coming down south is a travesty, you know. I don't hear -- I hear a quick, cheap, easy fix, trying to get water to the south state, you know, because there is a democratic vote that will push it through because of the population. Well, what California was supposed to be was a republic, where the individual rights cannot be overshadowed by the mass majority. And that's not being -- happening.
271	Isaac Kinney	This project is obsolete, unstable infrastructure. We know how tunnels work. We know how these big type of reservoirs work. These, quote, unquote water banks, they do not work. And so to keep investing the public's money into this type of infrastructure is also very problematic, especially if the governor is saying he's looking out for the people of California.
273	Tess Latter	I'm quite shocked that a project like this is being considered. You are taking away water from tribes, from innocent children, from families, from ecosystems. Considering climate change going on, it is massively irresponsible just to put more money in corporations that are already rich. These tribes are suffering and they've suffered enough. This has to stop. I can't see how any of you can justify something like this.
275	Osha Meserve Local Agencies of the North Delta	So we don't think we need tunnels for secure water supply. We don't need it for the ecological systems obviously. Obviously, terrible impacts on the tribal communities throughout the state and terrible impacts on the Delta communities. It's not just about construction.

277	Cliff Moriyama California Building Industry Association	We support the notice of preparation for this project. The continued use of the 6,000 cfs figure is critical as you move forward through calculations and as the EIR process moves forward.
278	Danielle Ray Frank	Fish are endangered in the Trinity River and there is not enough river in the water. This project takes water from us, and we weren't taken into consideration. Over our entire existence, we've been taught to thank the river and appreciate what the river gives. We haven't been able to do that because we've been so busy fighting for the river, fighting for the rights just to appreciate it, because we can, because it's not going to be there for very much longer if we don't do things like this and stop projects like this. We're asking you to reconsider this project and take us into account, because without our river, we're nothing.
280	Bob Saunders	We have to live with the unintended consequences at great expense of our livelihood, natural resources, ecology, and life.
283	James Thuerwachter California Alliance for Jobs	We express our strong support of the governor's Delta Conveyance project. As mentioned previously, this is just one part of the solution to the state's complex water issues. One and two-thirds of Californians rely on a water distribution system that is both outdated and vulnerable to the threats of both climate change and natural disasters.
283	James Thuerwachter California Alliance for Jobs	Our current water distribution system isn't capable of handling the challenges associated with this new water -- with the new water feature. A modernized Delta conveyance will improve our ability to capture and move water during and after storm events to better prepare for future dry years. It will also fortify our infrastructure to withstand the hazards posed by earthquakes and floods.
283	James Thuerwachter California Alliance for Jobs	Moving forward with a project that does not balance protecting water security with enough capacity to pencil out financially would simply not make sense. This whole proposal is urgently needed and the time to act is now.
286	Roberto Valdez	This is not just an effort to save the wildlife but also to restore our economy for the future of California.
290	Ron Hasson California State Conference NAACP Environmental Justice Committee	We support the Delta Conveyance project. Access to safe drinking water is a basic human right. We cannot continue to standby while century-old practices continue to deteriorate and threaten our water security, especially for disadvantaged communities. Due to chemicals and climate change, the Delta Conveyance Project must ensure that we can provide clean drinking water to all communities and at a price far more affordable than many other sources of water. We are proud to stand with a broad coalition of environmentalists, social justice advocates, conservationists, and business supporters who understand the significance of this project.
291	Dan Drugan Calleguas Municipal Water District	We strongly support the 6,000 cfs alternative that's described in the NOP.

293	Clara Karger Central City Association	We request the project move forward with intentionality and certainty. Advancing the Delta Conveyance project safeguards our water supply and protects against the impact of climate change.
294	Michael Lewis Construction Industry Coalition on Water Quality	Look closely at the impact each of the options will have on our state's agricultural activities.
296	Ken Coate Inland Action	We support the 6,000 cfs tunnel.
297	Luis Portillo Inland Empire Economic Partnership	We support the 6,000 cfs tunnel.
298	Cathleen Pieroni Inland Empire Utilities Agency	I emphasize the need for this project and encourage it to happen in a timely and cost-effective way.
299	Ron Miller LA/Orange County Building Trades	We urge the state to move forward with this project.
300	Kendal Asuncion Los Angeles Area Chamber of Commerce	My name is Kendal Asuncion, and I represent the Los Angeles Area Chamber of Commerce. On its behalf, I'd like to express our support for a Delta conveyance tunnel.
300	Kendal Asuncion Los Angeles Area Chamber of Commerce	The State Water Project is an indispensable part of Southern California's $1.6 trillion economy. A water shortage caused by a disruption in water deliveries would have severe economic repercussions in Los Angeles and the Southern California Region that would ripple throughout the state. This project is an insurance policy to protect our economy and nearly a million jobs statewide while balancing the needs of the Bay Delta.
301	Steve Arakawa Metropolitan Water District of Southern California	Metropolitan has consistently identified a need for dealing with Delta conveyance in its integrated water resources planning, its water supply strategy, that would modernize California's ageing infrastructure, allowing water to more reliably move through the Delta and help manage our water supply through the climate extremes.
301	Steve Arakawa Metropolitan Water District of Southern California	Metropolitan and other water agencies have invested hundreds of millions of dollars and supported years of analysis and scientific work to determine the best ways to meet the state's goals of water supply reliability and ecosystem restoration.

303	Robert Hunter Municipal Water District of Orange County	MWDOC is in full support of the purpose and objectives listed on DWR ' s NOP fact sheet including: To assist in the development of a reasonable range of alternatives that would be analyzed in the EIR, the purpose of developing new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of water deliveries in a cost - effective manner consistent with the State's Water Resilience Portfolio, and the objectives of addressing sea level rise and climate change, minimize water supply distribution due to seismic risk, protect water supply reliability, and provide operational flexibility to improve aquatic conditions in the Delta.
304	Ken Raush El Monte/South Monte Chamber of Commerce	I am here today to express support for the 6,000 cfs single-tunnel Delta Conveyance Project being advanced by the Department of Water Resources.
304	Ken Raush El Monte/South Monte Chamber of Commerce	The single Delta Conveyance Project is that important investment that will ensure the reliability and quality of water for our communities while helping protect the environment. The single tunnel will create a more flexible system, allowing for water deliveries in a (indiscernible) time and a way to protect fish and prevent cutbacks. The intended purpose of this tunnel is nothing more than what was originally promised -- assured long-term imported water supply from the north for years and generations to come.
304	Ken Raush El Monte/South Monte Chamber of Commerce	We cannot continue kicking the can down the road. Both conveyance and ecosystems are in serious need of repair. Failure to address each of these will leave fundamental problems unsolved and the environment on the verge of collapse. This decision is a generational one that will literally change our landscapes, hopes, and economic futures for the Californians.
304	Ken Raush El Monte/South Monte Chamber of Commerce	On behalf of the El Monte/South El Monte Chamber of Commerce, I truly support moving forward with Governor Newsom's Administration's work on the planning process of the 6,000 cfs single-tunnel Delta Conveyance Project.
305	Derek Ryder	I've also lived and worked in Los Angeles as an architect for most of my adult life and believe we can be better stewards of the extensive water we've already imported into Southern California. California showed we could conserve water in the last drought, and I think Southern California in particular needs to step up again and cut back on the loans and other wasteful lifestyle, infrastructure, and agriculture choices that we make. As an architect of custom homes and mixed-use projects, I'm constantly trying to design buildings that minimize our footprint on the earth, whether that's in energy consumption or water use.
305	Derek Ryder	Finally, we should not cover over the business-as-usual practices of agribusiness -- as was just mentioned by a previous speaker, with pistachio farmers in the Central Valley or the developers that I'm more familiar with in the Southern California Inland Empire that are using much too much water on sprawled development -- with a fig leaf of resilience and water quality.

306	Henry Rogers South Bay Association of Chambers of Commerce	Our detailed comments were submitted in writing, but I 'm here to support the single-tunnel Delta conveyance system. Our members represent the 17 regional chambers from LAX down to Long Beach. We also serve as the voice of advocacy and issues - - for regional issues that we're seeing within the business community. We are in support of a conveyance tunnel. It's a game changer in the State's infrastructure projects. It's vital to our $1.6 trillion economy, and more importantly, our businesses and residents have consistently voted in support of it, and we should obviously protect those investments.
307	Brandon Dawson Sierra Club of California	The proposed project and the NOP-mentioned alternatives are not certain to provide water reliability for California. Indeed, it will only worsen environmental health conditions in the Delta to the detriment of that ecosystem and Delta communities and increase costs for many Californians here in Southern California and south of the Delta.
308	Mark Grey Building Industry Association of Southern California	California water issues are well documented and well known, but chief among them is that we are unable to adequately move water when it's available to us. Every year water is sent out to the sea because as our current infrastructure is unable to move water where it is needed. We reject the notion that we don't need a modernized conveyance system and that we can solve our water supply issues solely from conservation or developing local water supply sources alone. This is a very strong fundamental tenet of ours. It's not either/or. We need an all-of-the-above portfolio approach to improving the resilience of our water supply. Delta conveyance is central to a rich and comprehensive portfolio approach. Our cities and farms are doing a great job with water conservation and developing new local water resources, but we still desperately need to invest in our conveyance system. It's the only way to make the local solutions work most effectively and efficiently. And, finally, we encourage the State to move forward with this project to improve the reliability of our water distribution system, of course, while supporting housing in Southern California.
309	Marci Strange Southern California Partnership for Jobs	Southern California has a long tradition of investing in water projects. To meet the needs of future generations , these water projects are imperative not only with the need to comply with the Safe Drinking Water Act, but also as we continue to rebuild the great state of California and the critical issues that face our disadvantaged communities. Southern California Partnership For Jobs, in partnership with California Consulting, has started a program to research, submit, and fund grants for our disadvantaged communities who do not have the time or the means to get many of the much-needed water projects completed. These grant submittals will be done by a professional, and each grant application will be considered extremely competitive. Modernizing and upgrading our state's aging infrastructure with a single-tunnel properly sized to convey 6,000 cubic foot per second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem, and manage our water supply through climate extremes. We support the new administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance Project will provide.

310	Charles Wilson Southern California Water Coalition	We are encouraged and we applaud Governor Newsom. And to give you all direction within the resiliency portfolio that's modernizing the state's water delivery system is absolutely critical in helping to make a truly functional, broad- based resiliency portfolio possible.
311	Vicki Kirschenbaum Sustainable Burbank Commission	This tunnel would be the width of a four-story building resting on its side and would be 35 miles long. Unbelievably destructive, and every major environmental group/organization in this state has already been suing to stop the two tunnels or the one- tunnel project. Most the people who have spoken here seem to have no idea where the water from this tunnel would go. It would not come here to Southern California. It goes to corporate agribusinesses in the South Western Central Valley. They want to get more taxpayer-subsidized water at our expense. The tunnel would funnel massive amounts of water to Beverly Hills billionaire Stewart Resnick's agribusiness empire whose business uses more water every year than all the homes in LA combined. And the Resnick's, owners of the Wonderful Company, and their agribusiness associates have gained the state's water system to grow excessive amounts of pistachios and almonds in the desert. And now they want ratepayers to pay for a multibillion dollar tunnel to keep this thing going? These agribusiness companies already receive the majority of water from the Delta. They would continue to receive the majority of water from the Delta. We would like the $30 billion, instead of for a tunnel, to go to local resilience, to go to storm water capture, to go to conservation and recycling. Voters have been fighting this project since 1982, when we voted it down, and it should be buried once and for all.
312	Sarah Wiltfong Los Angeles County Business Federation	We're an alliance of more than 190 business organizations who represent over 400,000 employers with three and a half million employees in Los Angeles County. Our members consist of a variety of industries including labor, hospitals, education, restaurants, horse facilities, food processors, building industries, refineries, hospitality industries, transportation agencies, and more. We are dependent on them, and all of them are dependent on a clean, steady, and cost-effective flow of water. We strongly promote storm water capture and reuse, ocean desalination, and other conservation measures, but without the insurance of imported water, we cannot provide the stability and reliability that our $1.6 trillion economy requires. BizFed strongly supports the one-tunnel Delta Conveyance Project. It is the most cost - effective and reliable solution to work for our water problems.
314	Julie Bongers	Concerned about agribusiness and about Chinook salmon’s historic and future importance to California

316	Ronald Sullivan Eastern Municipal Water District	On behalf of Eastern Municipal Water District (EMWD) and its Board of Directors, we are pleased to provide comments on the scoping process of the single-tunnel Delta conveyance project currently being advanced by the Department of Water Resources. We appreciate Governor Newsom's initiative and willingness to pursue the Delta Conveyance project as it would help ensure, safe, affordable and reliable water supplies to many California residents. Water from the Sierra Nevada Mountains that flows through the Bay Delta provides the backbone water supply for millions of Southern Californian's, our $1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel, properly sized to convey 6,000 cubic-feet-per-second of water supply through the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through our increasingly variable climate.
316	Ronald Sullivan Eastern Municipal Water District	There is widespread support for the Delta Conveyance project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage caused by a levee failure or other natural disaster in the Bay Delta would come with enormous economic consequences, hence the time to move forward on the project is now.
316	Ronald Sullivan Eastern Municipal Water District	EMWD supports the Newsom Administration's work to advance the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With California's largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.
320	Adrienne Register	I am very opposed to the tunnel being built to remove water from the Delta as I believe there are a number of other options available which are more cost effective and don't degrade a very important ecological area and the foodbowl of America. I originally come from Australia where the debate of taking water from one area to give to another was held a number of years ago. It was found to not be the best solution and so was not implemented. What was done instead were a number of things:- water tanks were retro fitted under eave spaces and used to capture roof run off - new developments are required to include underground tanks to collect roof water to be used for toilet flushing/laundry and hose use - more smaller dams were built - watering during droughts was restricted to odd street number/odd watering day with fines introduced for violations and changed as required ...during this last drought leading up to the fires watering with a watering can was allowed2x a day for 15 mins a day between certain hours. These things don't sound much in themselves but all make an enormous difference. A Desalination plant was also built which has been very effective. So much so that they are looking to build a second one. This was more cost effective, meant water was produced close to where it was needed and didn't degrade another ecosystem. The area of sea around the desalination plant has been closely monitored since its construction and they have found that the higher salt concentration has actually increased the sea life in that area. Removing water from the Delta will turn a Food Bowl into a Dust Bowl. There are lots of alternatives out there with much better outcomes. Please be open to looking at creative solutions that won't have the negative impact removing water from the Delta will.

321	Christina Davis LAX Coastal Chamber of Commerce	On behalf of LAX Coastal Chamber of Commerce (LAXCC) Board of Directors, I am pleased to provide input for the scoping process of the single-tunnel Delta conveyance project being advanced by the California Department of Water Resources. We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies to much of California. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
323	Jeff Balmores	Good evening, council. I am Jeff Balmores, a seventeen year old, Little Manila After-School Program. I am here to discuss the consequences of approving the Delta Tunnel Project. Personally, I have concerns with how this project will affect the youth of our city, how it revolves around how the Delta Tunnel Project will negatively impact our air and water quality and the health of our youth.
323	Jeff Balmores	You should be ashamed if you allow this project to move on. I know that we have family that live near the Delta. And if this project is approved, they will become ill. Many of our water sources come from the Delta. How would we know that the water we drink is safe if this project moves forward? My generation and the generations that come after me will be affected. We won't be able to live as long as we want to live. The generations that come after us will not live that long. We won't be healthy anymore. We'll soon become a city of sick people. We don't want to become the next Flint, Michigan. How is poisoning our people benefiting us? Who does this project really benefit? As far as I can see, this project does not benefit us. So, therefore, I conclude this speech: Whenever you see water, whether you drink, swim, shower, whenever you go outside, think about how this project will affect you and your loved one's health.

325	Bill Wells California Delta Chamber and Visitor's Bureau	"Why is this project needed?" With the intakes in the southern Delta are only three feet above today's sea level, okay, I've been involved in this process for at least 15 years since Arnold Schwarzenegger announced his plan to divert the Sacramento River around the Delta, which he said would cost billion dollars. The original -- and I sat on the BDCP public panel for two and a half years, and I've testified countless times. I can't even -- I have no recollection of that. But, anyway, when it started, they wanted to divert the river because they thought earthquakes were going to destroy the Delta. Well, we spent a few years debunking that totally. And then Jerry Merrell, (ph) decided that the Delta is going to be destroyed by an arch storm, atmospheric river storm. So we debunked that too. So this whole thing, I question the sea level rise. If it's going to happen, then we need to build a dam in Carquinez Straits or the Golden Gate to prevent that, or increase the water coming down the river to make sure it flushes out the saltwater.
326	Orion Camero	…this is a mural that we worked on for the last four years. It talks about social and economic and ecological issues in California.· And, actually, if you can -- let me point to this. This is actually the Delta Conveyance Project. It has a corporate frog shaking hands with a public official. That's actually the Metropolitan Water District in a vest. So they're making a deal, and the conveyance project is sucking up water from our river.
326	Orion Camero	…for years in my organized work, I've spoken out against the Bay Delta Conservation Plan, the California WaterFix, and now here to oppose the Delta Conveyance Project in its current form.
326	Orion Camero	As a delegate that represented California at the UN17 Climate Negotiations for four years, I see our local issues as globally significant and also influential nationally. And so what the means is addressing this crises means fundamentally shifting away that we relate to our burdened waterways. The solutions that secure water need to reduce reliance on the Delta. The Delta Reform Act explicitly says so. And so this whole project essentially is a – as I see, is a total failure. Mainly, because time and time again, we've seen it with the peripheral tunnel, the peripheral canal in the '80s, the many other water construction projects. A tunnel and diversion is not going to work.
327	Jasmine Delafrost	So I'm opposed to this whole plan, that we must find other alternative ways.
328	Niria Alicia Garcia	And I have some alternatives for you guys actually. Why don't you end all fossil fuel projects that are very water intensive down in the Southern part of California? Why don't you stop growing GMO crops and actually grow crops that are for that land, you know. And if we could all just be a little more humble, and by all, I mean, the corporations and the big farmers that are so arrogant, think they can just come into this landscape and destroy it and change it for profit. I mean, who grows· water intensive crops in the desert? Let's not be fooled. This project is a money-making project.
328	Niria Alicia Garcia	I want everyone in this room to look to your left and look to your right, because this project is not going to happen. And we're sending that message.·

328	Niria Alicia Garcia	I'm an aspiring mother -- and I know you guys have children. What are you going to tell your children and your grandchildren when they say, oh, why do I have to learn about salmon next to dinosaur bones? Why do I have to learn about the Delta smelt in museums? What were you doing when they were selling our water?
328	Niria Alicia Garcia	I'm going to say, you know what? I was standing with hundreds of people that were saying no with thousands of people, because there's thousands of people that couldn't make it out here tonight. And so I want us to take this opportunity to meet each other, because we're going to be out there. We're not going to let this project go through.
330	Sharon Jarvis	And I just think that I agree with everybody here. I feel like fraud has been perpetrated on us. Oh, we were going to have the twin tunnels. I spent a lot of time writing a comment about that. Oh, well, now, just change it, and we'll just have one tunnel, and now we'll all be fine. I don't think so.
331	Sol Jobrack Stockton City Council	I title my speech, Stockton is Going to be a Tough Place to Get By." I think looking around the room, you're going to have a hard time getting anybody to come up and speak in favor of this. I deal with a lot of policy makers in the area, and I haven't met one around here that says I'm really excited about any water being diverted. I know you guys are in a tough place. I often sit on your side and have to hear the public and how angry they can be at some of the decisions we have to make. But we often see people supporting and not supporting. I have a hard time thinking ya'll are going to get support for this project in this region.
331	Sol Jobrack Stockton City Council	One of the things that I really pride myself in as a council member, I'm not a forever politician.· What I really want to do is leave a legacy that the next council member doesn't have to make the tough decisions I have to make, whether that be financial or environmental, which is a lot of reasons that people are here right now. And what I don't want to do is leave that legacy where 20 or 30 years from now, somebody is cleaning up my mess. I have one year on the council, three to go. I will never support this. And, God willing, I have four more years after that, so seven years of no votes that you're going to get from at least one of the council members.
333	Roger Kelly	I oppose any Delta tunnel proposal.
333	Roger Kelly	Why is it fair to rob Peter to pay Paul? We're just as important. And there's not enough water to give.
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	The League of California has long-standing policies supporting nonstructural alternatives for water supply in California.
336	Tafari Lee	I actually visited Lodi Lake for the first time in maybe two or three years last weekend. I had found that it was completely dried out. The trees in the area were dying and the grass was starting to dry out. And that is the last thing that I want to happen to the Delta. This is the last thing I want for Stockton.

336	Tafari Lee	And with a project like this, as people have told you, no, you're not going to find many people that are going to want to back it. And I personally believe that this -- the money that we're going to use for this and the resources that are going to be put into this can actually be put into something that can help us and benefit us more locally, rather than something that's going to help the people down in L.A. and not actually help the people of Stockton.
336	Tafari Lee	And another thing I wanted to address was what's going on with the people from the south side and the people -- like the people who live in the areas, the people who's ancestors help to create these waterways, the people who are -- the people who are not going to benefit from this at all are the people who should be benefiting from it the most. They're the people who their ancestors helped create this waterway. They are the people who are the reason that this waterway exists, and it's being drained away from them. If anything, this isn't going to help them. It's going to make it worse for them.
336	Tafari Lee	So if we were to take like the money and the resources that we were to use for this instead of putting it into something that would maybe help clea4 up the Delta to make it more appealable to people, so that way, more people come and more people would visit, we have another thing to do in Stockton, something big, something we can be proud of, something that we can show off, and not some waterway that is being drained off to SoCal.
340	Dan Nomellini, Jr Central Delta Water Agency	We are absolutely opposed to the preferred project. Under no circumstances will we tolerate that. I wanted to highlight some of the most disturbing things that I see.
342	Darius Waiters	When you pollute the environment the people live in, you pollute the people in the environment. When you pollute the ground from under the community, the community is devastated.
342	Darius Waiters	Are you aware of the reparations? Do you even care? Do you think we don't see your thirst? You can ignore the science, but you cannot ignore us. We are not fools. We know a parched tongue when we see one. We know a dry mouth when we see one. If you take our water, you take us with you.
342	Darius Waiters	You should fear the bloods that Stocktonians know how to make. If it's water you wish for, then I offer you the sweat and tears of our humble struggling city. You will drown in our protest, be taken by the wave of our beating hearts. What is your thirst and greed to a community that will fight for the only thing that it has left?"
343	Margo Praus Sierra Club of California Member	I really appreciate the speakers' comments about the irreparable damage you're doing.
348	Jack Saunders	I hope that this particular process will help you get to a conclusion that doesn't include a tunnel.
349	David Scatena	And I want to begin by saying that the conveyance and neither of the alignments are acceptable to me as a person who lives in this area.
354	Martha Valdez	You are going to cause irreparable damage.

356	John Heffernan South Bay Association of Chambers of Commerce	With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
357	Dominik Knoll Redondo Beach Chamber of Commerce	With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
358	Henry Rogers Harbor Association of Industry and Commerce	With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
359	Daniel Armstrong	And that's my lasting sentiment, is that you really are on the wrong side of history if you go forward with this.
384	Stuart Walthall	One alternative is to not have a Delta Conveyance at all.
393	Christophe LaBelle Silicon Valley Leadership Group	The Silicon Leadership Group is in strong support of the governor's Delta conveyance plan.
395	Michael Frost	The monetary costs, the environmental costs and the opportunity cost to these Delta tunnels is immense. The opportunity cost is probably the highest because we are walking off of a cliff. And we can easily, under our own power, turn to the side and turn around and go in a different direction.
396	Penelope Frost	I want to stop the people who take water from the Delta, and I think that the Santa Clara Valley Water District and state and federal government can help us with that.
397	Elke Rank Zone 7 Water Agency	Delta Conveyance and the state water project are critical components to support regional and local water supplies, including the Bay Area.
399	Paul Sethy Alameda County Water District	With the threat of climate change and sea level rise quickly approaching, the Delta Conveyance Project seeks to address these significant challenges.
400	Chris Smith Associated General Contractors of California	The proposed Delta Conveyance Project will address many of California's complex water challenges and will be critical in improving infrastructure that supplies water for millions of Californians. Moving forward with a project that does not deliver enough water economically, though, would be a mistake. We know that without proper water infrastructure, California's economic growth can be slowed, rates could rise and the health of the Delta will continue to decline. So we need a project that can run about 6,000 to 7,500 cubic feet per second. Acting now to improve the security and reliability of water supplies will support new growth and allow us to continue to move forward in the state.
401	Chris Snyder International Operating Engineers Local 3	Expressed support on behalf of the International Operating Engineers. Without adequate improvements, this system could collapse in the event of a major earthquake or flood and cut the water supplies off for millions of Californians. This is a real danger and a real threat. The system is antiquated. This would have a devastating impact on California's economy, with estimated costs in the billions and billions of dollars.

402	Clint Steele Operating Engineers Local 3 union	We are pleased to see that the State has initiated an environmental review process modernized Delta conveyance. Our current system of pipe, pumps and levees is aging and is desperate need of repair. Upgrading our water infrastructure is a long overdue step toward a more secure and resilient water future for California. Without fixing our main water distribution network, efforts to develop local water supplies, like desalination and groundwater recycling, will be less effective.
403	James Thuerwachter California Alliance for Jobs	I'm here today to express our strong support for the Delta Conveyance Project. As mentioned earlier by other speakers, we are -- we do understand that this is just one part of the broader solution to California's complex water problems and issues. However, we do believe that it will serve a positive and critical component to the more comprehensive water portfolio of the state.
419	Michael DiMartino	What will happen with this Delta tunnel will affect the quality of life in Northern California, the Central Valley. Not just for us, but for generations to come, and innovation is a solution. We're looking at old designs. We're looking at old broken systems. Look at Oroville Dam. Look at all the things that are happening all around the world with the crumbling infrastructure. We're living in an old design. There is a new innovative consciousness that's happening whether it's permaculture, sustainable energy that has the solutions. We don't have to recreate a wheel.
422	Marilyn Gill	Family has a long history in Clarksburg. Ms. Gill helped organize the community around saving the school building years ago. Opposes the proposed tunnels to send water to Southern California.
428	Patrick Porgans Porgans & Associates	We don't need a tunnel, period. I've provided documentation at the California so-called WaterFix hearings and provided the exhibits to substantiate my position that we can get 300 to 500,000 acre feet of additional water in most water year types from the Delta making a few minor adjustments in the land use issues, so we can do that. DWR has not been held accountable in the past – for Oroville Dam, or for violating water right permits in the 1987-1992 drought.
431	Robert Swenson	I want future generations to have the same experience that I had as a child. I want this nurturing community to continue to positively help shape kids in critical times, just as Clarksburg and this Ag community has done for me. Plans to creating tunnel systems would deter members of this fine community from being able to remain here. It would destroy the bond that the people of Clarksburg and the larger Delta communities have with one another -- one another, by creating unlivable conditions: Dewatering, increased air pollution, increased traffic construction, increased noise pollution, and loss of prime agricultural land. Kids like me are at risk of losing the opportunity to learn from the farmers and continue the honorable tradition of family farming in the Delta. I hope that alternatives to taking away prime farmland from farmers would be considered.

433	Michael Seaman	Instead of the ridiculous ill-conceived tunnel, the state should embrace the regional sustainability projects found in Governor Newsom's Water Resilience Portfolio. The state should stop relying on Delta water exports and end the troubled tunnel project. Californians do not want the tunnel project to go forward, particularly given the Trump Administration's failed water plan. I want the San Francisco Bay Delta Estuary protected. I voted against the Peripheral Canal. I fought against the Twin Tunnels project. And I strongly oppose the current single tunnel project. Important qualities of the Delta include native fish and wildlife, sustainable agriculture and recreation, the economic livelihood of the Delta residents, commercial and sport fishing, etc.
441	Evan Aanenson	I'm a Medaki Pit River Tribal member, and I'm just here to amplify all the voices of the indigenous people who spoke before me. Okay. Thank you. Bye. I also don't approve of this project.
444	Leona Charles	I study indigenous people, and I see all of this here, and I don't see anything about people, and I happen to be one, and I'm a people. I don't really know what to say. This is a undertaking project, and it's -- it's an undertaking. It's an undertaking. There's no doubt in my mind it's an undertaking. I don't know, maybe we should tell the president that there's immigrants coming through the tunnel.
446	Dania Rose Colegrove	Before when I questioned you guys' plan here, I didn't see Trinity River or the Klamath River on your guys' -- on your map. Very concerning. I'm opposing your guys' plan. You guys -- your twin tunnel was a dump. Now your single tunnel's going to be a dump. We need to go it zero tunnel. You guys aren't thinking about -- you aren't thinking about north of the north state. You guys are all just thinking about Southern California where everybody's at. Well, what are they going to do when they run out of water because we're going to cut them off?
447	Corey Collier	This is the Winnemem Wintu land. I live down in Chico but in the Mechoopda Maidu land. I'd like to point out that one season of rain did not end the drought. We are still in the drought. We are still in drought conditions. The drought is continuing. There doesn't look like there's going to be much more rain or precipitation this Spring. Water is not -- rivers are not inert sources of water. They're living beings, living ecosystems. If you move the water south, it becomes -- turns into farms. It turns into tomatoes and turns into almonds and turns into grapes which then are packed up, shipped out of California to leave the ecosystem forever. This is not sustainable. This is going to continue to not be sustainable. This must not happen. This cannot happen. Please listen to the indigenous people who have been stewarding this land for thousands of years. They will not stand alone if this project continues.

452	Jason Franklin	I'm here representing Eel River Wildlife and their unrecognized tribe over around Briceland area, Northern Mendocino and Southern Humboldt, and I'd like to say thank you to the Winnemem people. I'm opposed to the state doing anything. You know, the way that I was brought up, like it's Creator made all of this, and He made it perfect, and it works just fine, so leave it alone. You know, everybody's talking about climate change this and we have to change this to make up for that. You did enough. Don't raise the dam. Don't mess with the river. Leave it alone. Nobody can own water. You can't sell our water to rich farmers in the desert. That's ridiculous. It doesn't make any sense whatsoever, and it just seems like one more way to raise the dam and to get -- you know, line somebody's pockets. The government are not understanding is that you're taking a piece of these people's spirit.
455	Louis Gustefson	I'm Itsatawi. I represent Its, which is now known as the Pit River Tribe. I would employ you guys to do your best to articulate exactly what is being said here. A majority of water starts in the Pit River, and we meet up with others like we're all together like we are here, and it's powerful, and it's important for you guys to go back in a strong way and add these issues to your Environmental Impact Report because we are the environment, and it's not just native people. We have so many strong people speaking who are nonnative because this affects everybody. This is nonpartisan. This is non-gender. This is not anything to do with race whatsoever.
457	Winter Hawk Rouse	I'm 12 years old, and this is our homeland. Our water is not for sale. The fish and animals are my relatives.
463	Kee-Poon Kinney	No more diversions.
467	Mariah Looney Restore the Delta	Consider a no tunnel alternative over any plans for conveyance. It will wreak even more havoc on communities who have been struggling because of the greed of big corporate agriculture and farms planted in deserts. No tunnel is good for the Delta. No tunnel is good for tribal folks, and no tunnel is good for California.
468	Ruthie Maloney	I am Yurok and Navajo. I come from the rivers from Hoopa Valley on the Trinity River. I was born and raised there. I come from a family that is from Smoker Falls in Weitchpec off the Klamath and Trinity Rivers. I've seen in my lifetime the degradation and the ruining of our water and what it's done to our valley and to our families and to our spirits there. No tunnel. Quit taking our water. We need to have our water for things that -- for everything. For life. Water is life. I don't get why it's so hard to understand. If we don't have clean water, none of us are going to be here.
490	Clark Tuthill	I've lived up here in Shasta County, Trinity County area since 1970. The bottom line is there has been a water grab in California since the 1920's when William Mulholland and his partner misrepresented what was going to happen in the Owens Valley. Started there, and it's been going on ever since. This is -- this is like a huge heart up here and all the veins go down and they go to Southern California. It's been going on for a long time, and don't think for a minute that this isn't part of the project.

496	Marsha Hansen El Segundo Chamber of Commerce	We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies to much of California. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important.
498	John Bosler Cucamonga Valley Water District	We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies to much of California. Modernizing and improving California's water system is essential for the reliable delivery of water supplies to much of the state. Depending on the year, the Cucamonga Valley Water District's water supply is comprised of anywhere from 40-50% of imported water, which is water that comes from Northern California via the Sacramento-San Joaquin Delta and the State Water Project. But the Delta's declining ecosystem and 1,100 miles of levees are increasingly vulnerable to earthquakes, flooding, saltwater intrusion, and further environmental degradation. More than 30 percent of Southern California's water supply comes from the Sierra Nevada and it provides the backbone water supply for millions of people, our $1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes.
501	Richard	All the cities up north are getting bigger. EBMUD is pumping more water. There is less water in rivers. The Bay is getting starved of fresh water. Westlands Water District is pumping toxic waste in the river. They are going to kill the Bay. They are killing the river now. When they put fresh water down the river, we're going to get it.
504	Supervisor Diane Burgis Contra Costa County	This is a precious place that obviously we care about, and this idea of moving water from one place to another is older than ideas like cell phones and how far have we gotten. Technology has told us that we can do more. We are doing more with technology. We don't need to build a conveyance or a pipe to do that.

506	Ray Cohen	It seems to me not a few years ago when we talked about aboveground storage, dams, and so forth. The Director of California approved a bond, made it for $7 billion to build dams. As far as I know, no shovel up there has been turned. I just want to say, when we approved these bonds and these sort of things like this, you have to read the whole thing because somebody -- somewhere it will say in that explanation and everything, we're going to do this unless we come up with something that has a better idea, and we think you guys don't know anything about. You don't understand. What are you going to take the money that you hoped to spend on your dams, but we're going to spend it on something else. Because we, they, whoever they are have decided, that's more important then what we thought we were going to do it our own way. So check that out.
511	Rich Fitz	Do not think that your tunnels are a better solution to the Peripheral Canal. As bad as the canal was, the tunnels are 100 times worse.
513	Jim Hall	This project is not better and greater than the Peripheral Canal. It's far more expensive, the cost of that, than the peripheral canal is -- you do the numbers. So we're trying to do the same thing without -- and bypassing the electric.
514	Jan McCleery	Neither the Water Board nor the Delta Stewardship Council can approve intakes of those locations, so I was dismayed when the new single tunnel plan came out with the same rejected Through-Delta route, relabeled the central corridor, and has an alternative eastern corridor. They used a purple swath, and it doesn't have any information, and we're hearing that there's also problems there. Regardless of route, the new plan has the same intakes in the same location. We know that DWR has existing water right there, but it's -- there's just too many impacts and DFWR will have to request a new water right if it's going to keep going forward with the single tunnel.
517	Dan Liveley	This is a noneconomic use of funds. This is a power mad project that uses tons of electricity. It also, basically, is a quid pro quo to keep from buying those from Southern California and extricating money from the Western Water District.
517	Dan Liveley	The Peripheral Canal is simply a mode in which to feed more water to all the other river allocations.
517	Dan Liveley	This project will kill the third entire ecosystem. You take down the Delta, you take down the Foothill streams, you take down the Bay. It kills the entire ecosystem, the Bay and the Delta, and all the fisheries.
524	Linda Ormonde	This project has been studied for over 50 years and it’s never been feasible.
526	Richard Pyke	We are going to destroy the Delta for a business (Central Valley agribusiness) that contributes less than 2 percent to California’s total economy.

533	Steven Starratt	This project has to do with getting more water to the Department of Water and Power in Southern California. None of these plans have anything to do with increasing the supply of water. They want to take it before it gets to the Delta. Another dam will not be built. We will not gain any new fresh water. We will never solve this problem with these plans for tunnels. In a drought, all the water will be sent to Southern California and the Delta will be a saltwater marsh land. Stop this plan to move water from one part of the state to another. The Pacific Ocean can solve the problem. Build desalination plants and stop the water at the Tehachapi Mountains.
534	Todd Combs	If you have water flowing in two different directions (like the inlet to pump down to Southern California) you can't tell us this won't have an impact on the environment.
544	Betty Miller	Delta farmers will have their livelihoods negatively affected.
545	Loren Rhodes	It is absolutely unconscionable that departments meant to protect the taxpayers of California are still trying to destroy the Delta by finding ways to pump more tax subsidized water to Corporate farmers who are plowing under crops that won't sell during the pandemic instead of donating to food banks. The billions of tax dollars wasted on the previous tunnel project should make it evident that pouring more money into another project only Corporate Farmers approve of is simply an expensive waste of time. There ARE more cost-effective ways.
546	Felice Caleroni	I vote no on the tunnel(s).
547	Marjorie Lutz	No on the tunnel(s). Do Not build the proposed disastrous tunnels!! This would change the delta area forever, costing more than you can even imagine in wildlife, fish, native birds and migrating birds. That is not to mention the problems it would cause for farming in the whole area. In Florida, the "powers That Be" decided to cement and control the Okachobee River and the Everglades. Millions were spent in construction, with such horrible results that now, 25 years or so later, they are spending many MORE millions trying to undo the problem by removing miles of concrete and other impediments to the glades and the river. When you interrupt the natural flow of the planet's resources, everything in interrupted and the results are far more than the "experts" can imagine. DO NOT BUILD THE PROPOSED TUNNELS!!If you think the huge oil spills in the Gulf of Mexico were bad, this has the very real potential of being even worse.
548	Bill Wilson	Please do not proceed with the cross-delta tunnel. The concept is ill conceived, will ruin the delta, will exterminate delta wildlife and will ruin the surrounding local economies.
549	Maggi Baum	I am opposed to the project.
557	Tim McCabe	Please consider the cost difference the tunnel project is supposed to cost 12 billion dollars, In reality the projected cost is 70 Billion dollars. Who will be on the hook for this. Let L.A. support themselves.

563	Federico Barajas San Luis & Delta Mendota Water Authority	The Water Authority supports the Proposed Project objectives, including (1) addressing anticipated sea level rise and reasonably foreseeable consequences of climate change and variable hydrology, (2) minimizing reduction of south-of-Delta water deliveries resulting from natural disasters, (3) protecting the ability of south-of-Delta water deliveries to CVP and SWP contractors consistent with legal and contractual requirements, and (4) providing operational flexibility to improve aquatic conditions in the Delta and improve the reliability of water supply deliveries to Water Authority member agencies.
565	Roger Marks	No on the project.
569	Karen Mann Save the CA Delta Alliance	It appears that you are not listening to the people you have requested information from at the current and prior scoping meetings. I personally know of 4 recent meetings were 99.7% of the attendees were very much against the construction of the tunnels. We have repeatedly explained the reasons – which appear to have been ignored. May this be my official notice to you that I, Karen J. Mann – small business owner, delta resident, recreational boater, recreational fisherman, grandparent and 3rd generation resident to live in or around the San Francisco Bay Area – that I DO NOT WANT THE TUNNEL BUILT THROUGHTHE DELTA WATERWAYS! 1 TUNNEL IS 1 TUNNEL TOO MANY!!!!! The following OPPOSE THE TUNNEL PROJECT. Residents of Discovery Bay, Bethel Island, Rio Vista, Oakley, Brentwood, Stockton, Tracy & Manteca The recreational community (camping, fishing, boating) i.e. marinas, boat sales, RV equipment & sales, Camping gear, restaurants, etc. ESPN – televised broadcasts of fishing derbies Businesses Farmers Retail establishments Realtors The Native American Community Ancillary businesses to all the above
575	Chloe McKerr	I oppose the project. It is environmental injustice.
618	Gene Beley	Stop this project now for good.
622	Georgia June Goldberg	Stop this project.
625	Richard Jamison	It is difficult to understand how you could develop a proposal such as this. To create a project that would be so disruptive to the Delta and especially the large number of residents of Discovery Bay is astonishing. The traffic, noise, dust and other environmental and ecological consequences see to lack an understanding of the effects of this proposal.
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Buena Vista Rancheria of Me-Wuk Indians is not in support of the Delta Conveyance Project as proposed in the NOP. We offer a joint letter composed by the Natural Resources Department Water Program and the Tribal Historic Preservation Office (THPO) and Cultural Resources with input from the Tribal Council, and THPO Advisory Board.

632	Robert Hunter Municipal Water District of Orange County	We support the overall scoping for the Delta Conveyance Project at three possible intake facilities and at both the central and eastern corridor for conveyance options. The intake locations were thoroughly reviewed during the previous California WaterFix process and had strong rationale from both a fishery and construction perspective. Utilizing a decade of information and data from the previous process, this scoping process should be sufficiently broad yet refined enough to explore alternatives that are both cost-effective and achievable. This new single tunnel project has emerged to be largely a climate change project to make the existing system more resilient to sea level rise and more variable to weather patterns.
636	Julie Hanson	I don't understand how pulling more water south so that northern farmers have salty water is okay? The signs down south say it all, no water, no food....and that's exactly what will happen in the north if too much water is diverted south. Is it okay that the northern farmers are out because the water will be useless?
639	Theodora K. Atkinson	Feels the Delta conveyance plan will impoverish Northern CA monetarily and through diminished water resources
672	Andrew McHugh	Instead of creating less dependence upon the Sacramento River you have been rubber stamping legislation that will roll back the Endangered Species Act and allow the ill-advised and reckless boondoggle and corporate welfare known as the Delta Tunnel / Tunnels to proceed without so much as a word of promotion notifying Californians of your neglect to the facts of both the environmental impact and return on investments reports.
673	Jan Hagen	I am writing today to express my opposition to the proposed Central Corridor.
687	Linda Snyder	Do not build a tunnel anywhere but especially near our house in Discovery Bay
688	Alexandra Perry	I am respectfully requesting that the California Natural Resources Agency, Department of Water Resources, and Delta Stewardship Council suspend and cease all Delta Conveyance Project (DCP) activity that entails actions by state and federal agencies during the duration of the Novel Coronavirus Pandemic emergency.
688	Alexandra Perry	The Redding hearing was the only hearing held in the North State and therefore the majority of people located in the North State and on the source waters for the tunnels have been unable to engage in the process thus far.
689	Katherine Fritz	The Delta Tunnel Project is a massive mistake
690	Julio Rosales	No tunnels is my first choice.
691	Jennifer Formoso	Do not put in a tunnel to syphon water from the delta south.

694	Delta Counties Coalition	DCC is disappointed that despite an indication in early 2019 that the State would be taking a fresh look at the issue of water exports from the Delta, a project nearly identical to the California WaterFix project is being proposed. In fact, a comparison of the Project and WaterFix project maps show that the current Project is largely the same in terms of intake locations, tunnel corridors, and pumping plant, forebay, and conveyance locations. (See Exhibit1.) Thus, the Project is likely to have most of the same significant and unavoidable environmental and other impacts as its predecessors. DWR must scrupulously follow the mandates of CEQA to ensure that the Project's impacts are clearly disclosed and adequately mitigated, and all feasible alternatives are carefully considered.
695	Marlene Willmes	Please stop the tunnels.
699	Ray M. Baca Engineering Contractors' Association	Comment supports a project that moves forward in a manner that achieves the goals of water supply reliability and ecosystem restoration.
700	Melanie Barna	Opposes project
703	Gabrielle Broche	No tunnel, no diverting more water.
705	Roger Mammon	How is it justified to worsen conditions for people living in the Delta to benefit those outside of the Delta?
706	Shelley Ostrowski Westlands Water District	The District has historically supported efforts similar to the Proposed Project, to investigate the potential for Delta Conveyance facilities that enable both CVP and State Water Project ("SWP") water to enhance the manner in which water is conveyed to areas south of the Delta.
709	Daniel Bacher	My conclusion is the Delta Tunnel project, as described in the EIR, would present a tremendous danger to the fisheries that I write and edit articles about.
713	Mike Bassi	I am a member of Restore The Delta and live in the Delta area. I've been able to watch the decimation of the Delta over the last 30 years due to illegal over pumping of water due to lack of oversight of regulations that have been set up to guard and protect Delta water quality and sustainability
717	David Ledger Shasta Environmental Alliance	Our concerns about the proposed Delta Conveyance Project is that it will ultimately result in increased water diversions and further degradation of the Sacramento River ecosystem including the Delta area and the San Francisco Bay due to increased water diversions.
717	David Ledger Shasta Environmental Alliance	The EIR should study the feasibility of increased water rates to water districts and corporations that use California water irrigating high water use crops that are primarily for export and do not benefit the citizens of California or the nation. This would include crops such as almonds and cotton that are high users of water and primarily sold for export.
721	Michael McDowell Double M Farms	I ask that the state to face the reality that this project is horrible and start looking at all of the local and regional water projects that will make a huge impact in California's water sustainability and security with minor impacts to communities and the environment.

723	Charlene Woodcock	I strongly urge you to reflect on all our best interests and end this too-large, too-costly project planned before there was sufficient understanding of the consequences of climate disruption.
723	Charlene Woodcock	The huge magnitude of the tunnel water conveyance plan, its environmental damage, and its cost to taxpayers, is simply not justifiable as a means to address the state's water needs.
725	Susan Wilson	I am writing to express my vehement opposition to the Delta Conveyance Project aka Delta Tunnel Project.
728	Jem Unger Hicks	I am writing this email in strong opposition to the Delta Conveyance project.
738	Chase McCormick	This plan cannot go through!!
742	Victor Rosasco	I have a number of concerns about going forward with this tunnel before longstanding problems with the flow of water in the Delta are worked out.
742	Victor Rosasco	In closing I feel that a predetermined path has been chosen by the agencies involved if this procedure moves forward without looking at alternatives
748	Santa Clara Valley Water District (SCVWD)	Valley Water supports DWR's fundamental purpose for proposing to develop new diversion and conveyance facilities in the Delta "to restore and protect the reliability of the State Water Project (SWP) water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State's Water Resilience Portfolio".
749	Augostina Duncan	The BEST plan for the future of ALL of California (norther, central, and south) is NO TUNNEL! A portfolio of multiple, better solutions for the state should be the focus: Groundwater recharge, desalination, recycling, innovative water storage and management, water conservation focused farming methods, research into improved use of technology to manage water for farms and industrial use, and good old conservation (like replacing nonessential lawns and landscaping with native/appropriate landscaping in ALL parts of California).
756	Eric Mourelatos	The very first election I voted in my young life was to vote NO on the peripheral canal. This tunnel plan is no different. You can't continually change the packaging to try to hide the truth. This was voted against and now you just want to try too fool us into a conveyance plan for wealthy farmers in the valley i.e.-Resnick! This will destroy the largest estuary in the western US. Salt water intrusion will permanently alter the environment killing native vegetation, fish and wildlife! Not to mention it will not add one drop of water to the states supply. I demand that you stop this intrusion into the environment and the delta.
767	Kelly Taber City of Stockton	Stockton remains disappointed that DWR is proceeding with a Delta tunnel in lieu of more environmentally sensitive, cost-effective alternatives for improving regional water supply reliability. The Project is an imprudent multi-billion-dollar enterprise that may eventually benefit Delta exporters, but at great expense and risk of failure, injury, death, and financial irresponsibility. This Project fails to prioritize and protect the water supply, health, and safety of Delta residents. The lack of consideration for a less impactful more regionally based alternatives will further jeopardize the life and economy of our communities and sensitive Delta habitats.

769	Richard Solomon	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages. Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta. Third, Delta farmers will also have their livelihoods negatively affected. Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
770	Arnold Plonczak and Judi Collins	I have attached a copy of an original paper from 1981 which addresses the original peripheral canal which was voted down at that time. The portion of this original paper explains a dozen facts why this would be impacting the Delta in a negative way. Since we have lived here in Discover Bay and have used the Delta since the late 1950s we have seen a big difference in the waterways and hope that this little bit of information from the past can be helpful. Attached two news clippings titled "A Dozen Facts to Help Convince Your Friends to Vote 'No' on SB200" and "It's Not the Canal, It's the Water." Both articles regarding the 1981 vote on the then-proposed peripheral canal.
777	Sarah Wiltfong Los Angeles County Business Federation	BizFed supports an "all-the-above" approach to our water needs and has been highly supportive of the Delta Conveyance since the beginning, and we will continue to be supportive for the following reasons. Reliability and Local Supplies - Our region is highly reliant on an outdated water distribution system that was built mid- 20th Century to deliver water supplies to millions of residents and thousands of businesses. While we strongly promote stormwater capture and reuse, ocean desalination and conservation measures, it is not enough. Without the insurance of imported water, particularly during dry years, we cannot provide the stability and reliability that our $1.6 trillion economy requires. We strongly support building a tunnel that will provide a reliable flow of water to our area, which will in turn allow us to continue to build local and reliable supplies. Cost-Effective - If we tried to develop new local supplies to replace the imported water supply, which would be exceptionally difficult, it would cost significantly more per household than the Delta Conveyance. Environmentally Sustainable - A modern system can keep the flows manageable and still provide water for export while preserving and restoring the Delta. Modernizing and upgrading our state's aging infrastructure with a single tunnel, specifically one that allows for 6,000 cubic-feet-per-second of water supply, will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate change.
778	Jacklyn Shaw	Ms. Shaw outlines the Bill of Rights as it relates to liabilities of "such a wasteful plan." These include Delta exports favoring non-local regions and ignoring locally-elected officials, lack of regional responsibilities in southern CA, etc.
779	Carol Kennedy and Bobby Ferreira	This project is a nightmare for people who live anywhere near it. We will all be driven insane by the dirt, smoke, vibrations and noise it the nightmare ever gets approved. It will be like someone fracking in our back yard. How will the levees withstand that? Anyone with pre-existing health issues will certainly have to sell their homes and move.

782	Robert Shaver Alameda County Water District	Alameda County Water District (ACWD) receives on average 40% of its water supply from the State Water Project, so has a significant interest in the long-term reliability of the State's water System. ACWD customers have made significant investments over many years in a diversified portfolio of water supplies, and we continue to pursue significant water conservation and in our service area, as well as regional partnerships. Even with these intensive efforts, the SWP remains an important supply for our customers and region. With the threats of climate change and sea level rise quickly approaching, the Delta Conveyance Project seeks to address these significant challenges. It would also reduce the risk of disruptions in SWP supplies to ACWD customers in the event of emergencies, such as earthquakes or other water quality emergencies. The costs of the project borne by ACWD customers are still being determined, and we will continue to evaluate the cost-effectiveness and benefits of the project. We anticipate that a Delta Conveyance Project will have significant benefits to ACWD customers.
783	Mark Miyoshi Winnemem Wintu Tribe	The Delta Conveyance Project (Project) will cost the State of California billions of dollars; transform the entire water delivery system of the State; and profoundly affect/adversely affect ecosystems from North to South. The Winnemem Wintu Tribe's future generations and at risk species will suffer the impacts of the Project. The legacy of this corporate welfare project will be the distant memory of the Delta and extinct salmon, Delta smelt and other species; a huge debt on the backs of citizen taxpayers; and a water delivery system that perpetuates the unsustainable paradigm of economic growth based on single family housing developments, profit based corporate farming and municipal commerce and expansion with water needs inappropriate for a desert location.
784	Rick Downey	It is obvious to anyone with a brain that the use of Delta water to grow unsustainable crops is ridiculous. Get real - California is going back to be a "semi arid region", which is how the Spanish explorers first described it. You are trying to fight nature - you will not win! You will only destroy the non-arid regions in your attempts that will certainly fail.
791	Arabella Merlo	As a property owner on Brack Tract, located at the west end of Woodbridge Road, and as a member of Reclamation District #2033, I am writing in opposition to the proposed new diversion and conveyance facilities, especially the Eastern Tunnel Corridor option. This option is shown going thru Brack Tract and would directly affect my property. The Eastern Tunnel Corridor Option would directly affect our ability to farm with the construction obstacles and pollution, especially with only one entry, Woodbridge Road, to the tract. This option would directly affect Reclamation District 2033's ability to provide drainage and levee maintenance. The Eastern Tunnel Corridor option is also closer to Lodi and Stockton, bring its problems and pollution closer to large populations.

797	John Bosler Cucamonga Valley Water District	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.
802	Jacklyn Shaw	Where is AVAILABILITY of Conveyance map/ options to public news? Residents, rural and urban, are not aware of the DELTA MAP PLANS? Why not? Where are photos of all the communities, towns, etc. in East of Delta River? The elected Supervisors Coalition of Five Delta Counties wrote that any tunnel (or 'funnel") would be DEVASTATING to the Delta. Avoid Terminous with Tower Park and community recreation at large with aquatic sports. Originally, it was part of the Delta Heritage Act. IF ANY " FUNNEL/ CONVEYANCE, 60 feet wide for 400 miles away, it needs to BE ON WEST SIDE of the DELTA RIVER. When do we see a map plan with options, on website of DWR
808	Cheyene DeWeese	I am against the creation of any tunnel project that takes water from Northern California and sends it to any other region including Southern California. If Southern California or any other region wants fresh potable water, it should use the desalination process from the Pacific Ocean.
812	Pat Wolff	I don't want any more water shipped, siphoned or pumped south to the Los Angeles/southern California metropolis area. It just gets wasted! No one should be growing grass unless it will be eaten by grazing animals. No one should be planting any trees, shrubs or ground cover except those that are summer water intolerant and native to their area of California, unless the plants are specifically to grow food. Farmers should be rewarded for using water conservation methods so that less water is needed. If these became requirements, there would be no need for transferring water from the Bay area to southern California!

818	John Hakel Southern California Partnership for Jobs	Southern California Partnership for Jobs (SCPFJ) supports an "all-the-above" approach on our water needs and has been highly supportive of the Delta Conveyance since the beginning, and we will continue to be supportive through the entire process. California's outdated water delivery system, that was built mid-century, is in critical condition, and will not be able to carry us into the future. Without the insurance of imported water, particularly during dry years, we cannot provide the stability and reliability that our economy does/will require. We strongly support building a tunnel that will provide a reliable flow of water to our area, which will in turn allow us to continue to build local and reliable supplies.
820	Clark Tuthill	The main force behind this is Westlands Water District. The westside of the San Joaquin Valley is very poor farmland. Adding water to this area has created serious environmental problems over the years.
825	Joone Lopez Moulten Niguel Water District	The District considers the Delta Conveyance Project necessary in order to implement a long-term solution in the Delta which will result in significant benefit's to the District's water supply reliability. The District is supportive of a solution that results in increased water supply reliability to State Water Project Contractors; enhanced Delta ecosystem habitat with fewer conflicts between fisheries and water conveyance; reduced seismic failure risks; increased climate change resiliency; and equitable cost sharing. The District continues to support DWR's efforts on the Delta Conveyance Project to achieve the goals of providing water supply reliability and ecosystem restoration.
853	Susan Alexander	I am writing in strong opposition to the proposed project.
856	Danielle Woody	Hello my name is Danielle Woody. I'm calling to oppose the new single tunnel conveyance plan because it will still cost the same as the old plan and while it is 40% smaller, it will still have drought issues and also there will be environmental problems such as sea level rise from the salt water intruding into the Delta, and the project is intended to take 23 years and during that the costs will keep climbing as inflation rises.
856	Danielle Woody	Therefore I oppose the plan because it would also harm the Delta and it's recreation along with forming and commercial fishing because the Sacramento San Joaquin Delta is where a large number of salmon pass through and without any salmon the commercial fisherman will be able to make any money. Therefore I opposed the Delta tunnel plan. Thank you so much for your time. My phone number is 510-289-9180 and my ZIP Code is 94552. Again my name is Daniel Woody and my phone number is 510-289-9180. Thank you.
858	Rodney Deweese	My name is Rodney Deweese, 530-848-1272. I am completely against any tunnel project taking water from Northern California and sending it to Southern California.

860	Glen Caldwell	Hi. I'm calling to make a comment on Klamath River water diversion for the Delta. I'm opposed. My name is Glen Caldwell. My phone number is 707-836-6595 again 707-836- 6595. I was on the Klamath River during the Klamath River fish kill when water was diverted for potato farmers by previous administrations. I've seen the effects of high water temperature on salmonid health - those fish died because of high water temperatures and because they were infected with parasites that thrived in high water temperatures. I live in Northern California on the coast. Many of my neighbors are salmon fisherman and support a huge part of the economy in Northern California and the wild salmon deserve protection. Let farmers in the Central Valley find other sources of water or change to other crops. Salmon are historic species that deserve protection. I fish, my neighbors fish."
862	Sherry Cole	Hi this is Sherry Cole from Kaiser Home Care and I am an RN for over 43 years. I think it's absolutely awful that during the COVID-19 that Governor Newsom is not stopping any of the actions on the Delta tunnels which I am against. The water should not be taken from our Delta. You're going to destroy Northern California and you're going to destroy people's lives up here. My address is 1350 Indiana Drive Concord California 94521 and I am against the Delta tunnels and especially any actions during COVD-19. Thank you. Bye bye.
863	Anita Bussell	I am almost 70 yrs old my mother is 90 yrs and her sister is 101 yr... all of our lives the water has been a battle to keep. Mom and her parents did not agree or support the Trinity Dam and can see why... the water keeps getting taken from the Trinity River and sent some where else... look at the lands in the USA that were desert and now the land is being made into gardens...at the price of the water..... Hoover Dam... no water.... the Colorado River no longer runs free it runs dead.....the oceans are polluted with no fresh water helping them to clean the stuff that is left in it.....we have a drought going on ..... the water is needed here where is started of course for the fish but for us humans too...all lives matter.....keep the water in the river.....not in the tunnel .....
864	Christine Kroger	I do not support the Delta Conveyance Project. It will be devastating to the well being of the Delta and the community in Stockton.

866	Kathleen Whitefield	As a health professional, resident of the Sacramento River, and SF Bay Delta, I am against diversion of waters from this unique diverse eco system. As we know the health of the river and SF Bay depend on the influx of fresh water flows. Wetlands maintenance is important to healthy waters and life in the SF Bay Area. Diversion of Water will affect the fisheries. Smelt and Salmon in particular. Diversion of water will Concentrate Environmental Toxins that find their way to our river from home use of toxins to agriculture applications. One of these is the Glyophosphate from Round-up by Monsanto/Bayer. Another is Atrozine from the Syrgenta Corp which is banned in their home country of origin. The concentration of toxins many of which are endocrine disruptors will impact all wildlife and human health downstream. There are many communities that source some/all of their water from the Sacramento River Delta these toxins are not usually able to be filtered. Furthermore, over the years we have heard politicians and others promote the diversion of this ecosystem water ways for various reasons. They try to say it is for farmers. Yet we know that it was also intended for use in Shale Fracking. Many of these politicians have donations traced to this oil industry. No Fracking in California! No water diversion for Fracking! In Addition, if it is for "farms" why then are stake holders from Southern California stating it is also for human consumption. Communities from different regions need to be sustainable with the resources from those regions. It is not healthy, cost effective or sustainable to draw resources from where they are naturally occurring, and needed, to support unsustainable growth and usage in other municipality areas.
867	Tony Dunkle	The cost overruns and 23 year time table along with the complete shutdown and disruption of the delta is unacceptable.
867	Steve Oragin	As a long time resident and boater of Discovery Bay, I am against any tunnel being constructed under or over the Delta, or the diversion of water that naturally flows into the delta. The California aqueduct already depletes the Delta too much. Southern California, and the central valley need to focus on more storage, and desalination. Not robbing Peter to pay Paul !
867	Tony Dunkle	The minimal efforts to control the massive growth in the Los Angeles basin and control the extreme amount of water usage is unacceptable. The Colorado river water that flows into the So Cal region is using approximately 112 feet of water from the Lake Mead water reserve annually. This water is used mainly for the imperial valley irrigation (desert) district and the massive population in the LA Basin. If there was any thought to limiting the growth in SO CAL, and not start taking water reserves to the overgrown regions in this state, I would think that the water tunnels and the budgets would be utilized for other programs that would enhance the livability in California.
868	Denece Vincent	As global sea levels rise there will be significantly LESS water available to send South as evidenced by the Bay-Delta model in Sausalito. Southern portions of California need to prepare now to meet their own water needs locally and not depend on infusions from Sacramento River water. It does no good to make the Delta go saline to support Growers of almonds and pomegranates in the southern valley! Don't destroy our Delta environment!

869	Gary Graham Hughes Biofuelwatch US (Global Justice Ecology Project)	There are many concerns about this proposed infrastructure project, the most serious is that the project threatens the ecological integrity of California's freshwater and tidal ecosystems. For instance, the potential impacts on the Trinity and Klamath Rivers have been and continue to be ignored by the agencies and private sectors proponents of a tunnel based Delta conveyance system. This proposed project is untenable, and does not serve the public interest. It is high past time to pursue more community based responses to the questions of water scarcity, the protection of biodiversity and the stewardship of an inclusive human economy that operates within the ecological limits of the landscapes that we depend upon for our livelihoods. No Delta Tunnel!
871	Helene Sisk Winnemem Wintu Tribe	As an Indigenous woman, I cannot imagine my life without Salmon. Not only, is Salmon a staple food in our lives... but it is a big part of our Origin story. The Salmon gave us his voice and we will forever Show up, Stand up and Speak up for our beloved Salmon.
872	Richard Huffman	This proposal for the tunnels will impact the over all Delta ecological systems. Not only fish and wild life but farmers that depends on the water flow. A very bad idea.
875	Sean Taketa McLaughlin	Please do not take water from our natural ecosystems to supply unsustainable and wasteful practices in other parts of the State. Our river ecosystems require adequate water to maintain the life of salmonids and other species that we rely upon for a healthy quality of life. NO TUNNELS or other diversions of water from true North California. Instead, extreme conservation measures need to be taken for areas that consume more water than they have.
876	Carlyle Terry	Having been a resident of the town of Discovery Bay for eleven years I don't want our area destroyed by the tunnel project and the over pumping of water to the corporate farms in the desert. This is an unsustainable project. It does nothing to add one drop of water to the system. We as a state that should be using science to guide us instead of corporate special interest. The farmers have a right to make a living but maybe they should learn to manage their resources better. They are planting even more trees than ever in a state that is mostly an irrigated desert. Maybe limiting the demand for water by not over planting in an area that has no natural supply of water would be prudent.
877	Katherine Wright River Delta Unified School District	We are worried that the Delta Conveyance Project will have a negative effect on our systems and cause a financial strain our District's budget. We have not heard of the project will require permission for access point through our District's property but we have not had success with this type of thing before and are not agreeable to this sort of request. All stakeholder groups are opposed to the Delta Conveyance Project for the reasons listed above.
882	Will Mehrten	We need to see this project through. We had billions approved by CA tax payers years ago to have a better long term water strategy and shocked to see that we are still in this phase of a solution.
883	Lee Provost	I say NO to this proposal. Why dig up and ruin property, affect farming, tear up migratory bird spots, and basically ruin the beautiful Delta to have water go to southern CA? 3,000 CFS water flow is not worth it, neither is 6,000 CFS is a pittance- a small amount of water conveyance to dig up and possibly mess with sea water intrusion into our waterways. There has to be a different way, perhaps a reservoir? NO to your proposal.

888	Joseph Selby	I am strongly opposed to the current plan for the single tunnel. This project would create enormous disruption to the quality of life for residents of Discovery Bay due to noise, traffic, air pollution and other factors. The path of the tunnel is entirely too close to residential portions of Discovery Bay.
889	Todd Scruggs	This tunnels plan is so wrong. These tunnels will turn the delta into a swamp with the lower amount of water flowing through it. Fish will die by the millions. It will destroy a recreation area for millions of residents because the water will become unusable due to lack of flow. This new plan is also terrible because it will shutdown part of the delta that is a very high recreation area.
890	Cheyene DeWeese	I am against the creation of any tunnel project that takes water from Northern California and sends it to any other region including Southern California.
892	Anita Jennings	Nothing trump touched is good for environment, people, small farmer, wildlife. Salmon and smelt (salmon food) are doomed. Fisheries are a multi million dollar industry. Westland is a developer for so ca and big agriculture. without honest, knowledgeable input, fisheries, estuary, wetlands will be destroyed in reality but of course, not on paper. A tragedy awaits most of us.
893	George Mark Remelman	The Delta must be protected! In the 70's it was the Jerry Brown Peripheral Canal, today it is the Delta Tunnel. The destruction of the Delta's fragile Ecosystem by water grabbers must be stopped! If there is any doubt about what can happen, look at the Owens Valley water project. Pristine land & watershed was destroyed to send water to LA, where wasting water is a way of life. Stop the project and send the Southern California money / lobbyists packing!
894	Melanie Barna	I do not approve a water conveyance tunnel. There are better solutions than the conveyance of water from the California Delta as a means to provide water to Southern California.
896	RT Fox	Please, please, please do NOT proceed with the proposed Delta tunnel! Science matters and this tunnel will dramatically reduce the quality of life for fish and people that depend on our delta as it exists now. There is barely enough water now and with future droughts it will be worse...and taking so much water away for almond farmers is just not right. Please do the right thing and do not approve this project.
897	Sheryl Lipari	Millions of us object to diverting fresh river water away from the fragile Delta ecosystem. Simple logic dictates that lowering fresh water flow will result in sea water intrusion which will destroy the Delta habitat and the fertile agricultural land adjacent. A simpler saline conversion program in SoCal can provide needed water there, as well helping to lower rising sea waters. This tunnel is a killer in more ways than one.
898	Linda Hanson	Any new tunnel diverting water away from the delta is not good for the local farmers, businesses, the natural wildlife, boating communities, fishing communities, parks along the delta, and the residential communities within 20 miles of the delta. The noise pollution will travel far across water and disrupt the peace and quiet of the delta life. Any new tunnel will destroy all communities and there will no longer be a delta region. The food source from agriculture is an essential resource which will be jeopardized by any new tunnel.

899	Terry Laughlin	This is the worst idea yet. It cannot come this close to residential areas.
902	Justin & Nicole Raleigh	I am a Discovery Bay resident, local fishing guide, and avid boater. I feel strongly against the proposed tunnel plan that will run through the south Delta into Clifton Court. This tunnel will greatly affect our waterway access to the south Delta areas such as Tracy. Beyond just water and fishing access, this also sits right in my own backyard. The added construction will cause traffic on an already plagued highway, pull water from an area that is already being drastically affected by the removal of fresh water at the current rate of extraction. We need better solutions that will not destroy the beauty of the California Delta and affect the life of the residents in the South Delta areas. Please consider other solution to our water problems such as desalination plants, rain collection and water treatment processing plants that can work for exterior watering solutions and save drinking water, for just that, not watering plants and lawns.
903	Edward Stetson	The "Delta Conveyance Project" would be a disaster for the ecology of the estuary, agriculture, Boating, fishing and the entire lifestyle of central California, It is a gross waste of money and does not contribute one drop of additional water, all to support the production of non-essential crops for Westland Agri-business. To protect this marvelous estuary for our children, grandchildren and future generations, we will fight this illegal water grab forever!
907	Linda Hall	We are totally against any tunnel. Changing the route will not solve the problems. You have not addressed that issue with an appropriate solution.
910	Liz Earp	Any change of the natural water flow of the delta should be prohibited
915	Scott Van Ausdal	As a lifelong Delta enthusiast, sportsman, boater, business owner, I strongly oppose the current DWR tunnel plans, especially the new Discovery bay route. The Environmental, economic, and recreational impacts to name just a few would be devastating to the Delta region and the businesses surrounding the Discovery Bay area. There are absolutely better options that would far better serve the communities as well as benefit the DWR than the current plans that are being brought forward.
916	Darrell Musick	I am writing to document my strong resistance to the tunnel project planned to send more Delta water to southern California. The planned tunnel would have a serious negative impact on the homes around the Discovery Bay area as well as the water quality throughout the Delta system. I urge the decision makers to consider the long term impact of water loss, especially during drought years, when water is diverted for crops and other competing needs. There are many opportunities to manage our limited water supply, I hope the agricultural community can learn to manage with smart farming techniques that may lead to lass water demand. The burden of agricultural should not have detrimental effects on fish, waterfowl and the communities that rely on the Delta for sustainability.
919	Rebecca Richert	Keep the Delta!
920	Catherine Howard	The tunnel project on the Delta must stop! It is absolutely appalling that this fight has been going on for so long. What a despicable waste of time and money. Leave the Delta alone!!!!

922	Keith Ryan	Opposed to the route near Discovery Bay, and against the tunnel plan, Horrible idea; amazing that the planners are clueless how much damage this would cause to the community. Going to be a huge wave of resistance and lawsuits if this moves forward.
923	Jennifer Formoso	Do not drain our delta. Do not build a tunnel to drain our delta. Do not continue to strip the delta of water. Do not damage the ecosystem in the delta by building a tunnel to drain water from the delta. It is offensive and wrong that you would even consider doing this.
927	Jan McCleery	ABANDON THE CENTRAL CORRIDOR ROUTE. For all of the right reasons, your Independent Technical Review Committee (ITRC) said that the Central Corridor is logistically impractical and the ITRC does not recommend this corridor be further studied. This is what Delta folks have been saying for ten years. To quote the committee's report: "The shaft locations are located a significant distance from Interstate 5, accessible by only farm roads with hindrances such as narrow weight-restricted bridges and single lanes. This makes supporting large operations, which requires a constant transfer of materials and people in and out, impractical and expensive as well as difficult to price. In addition, addressing safety, including hospital access and tunnel safety duplication, creates a costly layer or redundancy without definitive costs. While it was recognized that extensive roadway, levee, and likely barge improvements could be constructed as part of the project for the Central Corridor, the ITR offered: - The cost of improvements to provide reliable and safe access and egress at each site would exceed the cost of additional length of tunnel required for the East alignment. - Levee re-build, barge, and site preparation & stabilization is temporary work, and much of it (e.g. barge facilities) will require removal; - Labor and construction safety costs, regardless of improvements, are too uncertain to price due to the location and distance from any shaft on the Central Alignment to developed land/communities."
928	Julio Rosales	NO TUNNEL IS MY FIRST CHOICE. DWR needs to move or remove this Discovery Bay shaft and alter the tunnel route away from Discovery Bay homes if it does pass.
934	Stephen Schmitt	I am opposed to any and all tunnel projects.
935	Kim Desenberg	I am opposed to the Delta Tunnel Project. We need to protect the health and water quality of our delta - to protect the communities, our local farmers, our local water quality, but mostly to protect the health of the delta water for the wildlife. The food chain and the environment are at great risk, and could easily be destroyed irreparably only for the benefit of the corporate farms, water districts that will eventually sell excess water for profit, and to keep excess water usage supported in Southern California. I enjoy the delta for recreation, by sailing in it and on it. But the rights of the people who live there (I live at the end of the delta, on San Francisco Bay) and the rights of the wildlife and the food chain cannot be compromised.
938	Karen Schmidt	The Delta Conveyance Project is a huge waste of money as it does not create one more drop of water! There is a system in place to deliver water to areas south of the delta. The tunnel project has the potential to adversely affect the water quality of the San Joaquin delta area. Which in turn affects my water that I need to survive.

940	Anabel Crouch	The proposed delta tunnel Does Not solve the problem of water shortage for Southern California. What the proposed delta tunnel will do if allowed to proceed is disrupt numerous ecosystems within the larger delta ecosystem pushing many plant and aquatic species to endangered status and even extinction. Many humans depend on the delta region providing their livelihood from farming to recreation. Our delta water is always in danger of intruding bay waters raising salinity levels. We in California can and must come up with a solution to our water problem. The Delta Tunnel is NOT the solution.
946	Marti and David Cruz	The tunnel project makes no sense! Why would DWR want to completely destroy a beautiful, unique, one of a kind area in California? It is a gem in this state. To have construction for over 10 years, extra pollution, noise, sucking our wells dry, why why why? We have 3 schools in the area, which all of the students would be negatively affected by the construction of this ridiculous tunnel!
950	Juanita Cannon	Stop the tunnels.
952	Bill Wells California Delta Chambers & Visitor's Bureau	The California Delta Chambers & Visitor's Bureau opposes diverting the Sacramento River around the Delta whether it be by tunnel, canal, or other conveyance. The Delta is a fragile eco-system that supports many species of wildlife as well as serves as a home to many Californians. It is also a recreational hub for thousands of Californians that live in the surrounding area. The Delta has already been severely damaged by excessive water exports and this currently planned conveyance could destroy the entire region. We need to determine how much water can be exported without harming the waterways and limit exports to that amount. We need to lessen dependence on the Delta, let's follow the co-equal goals set forth by the Delta Stewardship Council: "'Coequal goals' means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place." I think the above sums up what needs to be done. There are many ways of "providing a more reliable water supply" without diverting the river. Please stop this project and let us all work together to resolve California's water challenges.
955	Donna Bramble	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages. Please do not move forward with this plan.
956	Betty Miller	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages. Please do not move forward with this plan.

957	Martin Freitas	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.

961	Jacklyn E. Shaw	"BROKEN PROMISES" as SPIGOT, QUID PRO QUOS are listed: For Delta counties and Rivers California, NorCal, SoCal and Federal laws of Bill of Rights, Who controls "spigots", flow of water exports and money diversions vs environmental travesties? What makes Secretary, DOI/Interior, say he can control the water flow from VA to CA? (1) MONO LAKE dissipation (Owens Valley) vs Los Angeles County, DWR imports, now advocates promoting nature's tributaries? (2) YOSEMITE FALLS is in drought (KCRA, 2.24.2020), since forest fires and half via Hatch Hetchy reservoir had gone to San Francisco for decades? (Fresno County best reclaim it as San Francisco starts using its Desalination plants, daily.) (3) WID VS EBMUD? Woodbridge vs East Bay (lodinews.com, 1.31.2018): Lodi/Mokelumne (River) Aqueduct has export increases? (4) Since PARDEE DAM, 1929 is towards Port of Oakland. Did Governor Pardee learn about water "redistribution" in a trip to Germany around 1901, with earthquake, 1906 (Wikipedia, 2014)? (Lodi growers protested paying taxes for water losses.) (5) DESALINATION was invented in California at UCB, with J. Leibovitz, 1977? Regional responsibility means this timely option. Unending, concrete repairs — cost more than desalination for Coast, with 90% of Californians? (Lodi does Desal. Why not L.A. or Mexico?) (6) DREDGING avoids flooding: Why did some former elected California officials, profiteers in water bonds, send USACE funds, for deep, pure DREDGING, Rio Vista to Antioch Bay, instead to Washington State? Has Dredging been a major way for decades, to avoid "flooding" (Sacbee.com 2014). (7) "BAIT and SWITCH" wording in alternatives to "no tunnel" of informed California voters, 1982, might be West side of Delta River near a ship canal? Response to suggestion: "Oh, no, I go duck hunting there." They count 17,000 salmon babies, but not a small grower's 17,000 green vines in threat? Redefine environment to include health of hospitable species of residents contributing to the agri-business economy. (8) With "WATER SOCIALISM" would it be more taxes, compounded, for water aqueduct exports from Washington State? One "funnel" 60 foot wide, for 500 miles. That is the size of a two lane roadway.) (9) DROUGHT RECYCLES to STATEWIDE? Since more salt causes more salt, how much is it a setup for drought statewide? (a) Ask J. Michaels, UOP data institute. (b) Why ignore multiple water options, with job opportunities. © Delta destruction is counter productive. (10) The WATER TABLE to homesteads west of Lodi, formerly with watermelons, was 16 foot in 1960's, but 34' in 2019 (50' above sea level)? Lodi area varies above sea level, from 35 feet to 900 for well-being. That is proof of corrupt climate change by competitive neighbors, if not cronyism. (11) DELTA MAP PLANS AND OPTIONS, with DWR? Where is any easy public view to impacted locales? If any "conveyance", make it West of Delta River, to be in compliance with wet years only. (12) RIVER CITY, Lodi Lake, what do "CaLodians" say about new Delta map plan, with Tower Park, nearly 15 miles from Lodi City, Hall? Where is free press, public service? (13) How about HEALTH, environmental and well being, in Delta counties vs itchy peat "snakes", dirt in Delta breeze, 20-90 mph? It is a costly, boondoggle construction for empty tunnel, convenience. (14) DUST BOWL ("Dejavu"): With the Midwest Dust Bowl, nobody knew or cared until the dust blew into the streets of New York. (15) Endless WATER BOARDING Meetings? Who's paid and keeps silent for "Bullet train, with no water for nowhere", and wasted monies. (16) LETTERS? Who cares or even knows to write letters, like to Department of Water Resources? Drought makes more drought. We don't want any conveyances for

		Delta Dust Bowl. (17) HOSPITALITY with FOOD CROPS: With most fertile soil for fresh food in the world, the Delta is a place of scenic, pastoral hospitality. Construction is better for jobs in agri-tourism industries, and maybe sparse tower homes.
962	Les Kishler	A mega tunnel to export water away from the Bay and Delta will jeopardize California water supplies in the future. The mega tunnel will encourage short sighted increases in large scale corporate agriculture and continued unwise growth in southern California. The Bay and Delta can't afford this unwise use of California's limited water supply.
963	Jon Jamieson	I keep my boat in the southern part of the Delta, Discovery Bay and I'm very concerned regarding the states continued proposed building of these tunnels and restricting our right of navigation presently available to us in this part of the Delta. I do not recommend the continued plans of the state regarding these proposed tunnels.
965	Patricia Martin Riverview Water Association	Please protect the ecosystem of the Delta. I'm opposed to the destructive tunnel project and any increased taking of water from the delta system. There are many more economical solutions that can be pursued.
968	Charles W. Helfrick	The switch to one tunnel is a typical political bait and switch tactic. The politicians and now able to tell us how much good we've done for you, we will not destroy your land with 2 tunnels, just one tunnel. This is just another Southern California water grab. This needs to be beat down just like the peripheral canal was years ago. The economic and ecological damage done to the Delta will never be able to be measured. Statements that extracting this water before it enters the Delta will not harm the Delta and in fact will help the Delta ecology are pure unadulterated lies. It doesn't take a rocket scientist to figure out that if you take away the fresh water before it enters the Delta, the void will be filled with salty seawater. STOP THE TUNNEL - ONE TUNNEL IS STILL ONE TUNNEL TOO MANY!!!
971	Rodger Silvers	I agree with the comments dated March 20th and provided to you by Restore the Delta, the grassroots non-profit organization championing a healthy San Francisco Bay estuary for the broadest array of stakeholders. Please address all of the gaps and concerns they identified in their comments.

972	Jeanette Okuye Valley Land Alliance	The Valley Land Alliance is a nonprofit with a mission to support and advance policies that 1. ensure a safe, domestic food supply, 2. protect our natural watersheds, 3. ensure farming and ranching remain economically viable and attract jobs that complement a dynamic agricultural economy, 4. advocate future development incorporates and pays for infrastructure such as: roads, sewage, reliable water, police, fire and schools and 5. support growth that is compact and maximized density within the existing city boundaries. We are opposed to this proposed tunnel for the following reasons: To ensure a safe, domestic food supply, farming with the best soil and water access must be protected. (American Farmland Trust July 2018 report: "Most of the high-quality agricultural land in the valley is found along the Highway 99 corridor where it is most vulnerable to development... Less than one out of ten acres of agricultural land in the valley is of high-quality with low water stress. In contrast 4 in 10 acres are of low-quality or experiencing high water stress.) With more water diverted by a tunnel the best soil/least water stress farmed areas will result in a Rob Peter to Pay Paul effect. The costs to move water is another concern. The further from the source the more cost for surface water. Movement of water takes much energy. We all pay for this cost directly and also indirectly with air quality reduced. Costs are increased also with more demand on pumping groundwater which is causing the subsiding of the California Aqueduct and canals. A tunnel won't resolve the drought problems and will not bring water use and available water into reconciliation. We promise more water to users than we actually have. With the rising of the ocean, the less snow pack the more increase of salts will be detrimental to farms in the Delta. Also the fish which require time spent in the Delta to acclimate moving between river and ocean will be effected with less fresh water moving through the Delta. With the Covid-19 pandemic this is a time to tighten our belts to weather this economic disaster. We have an opportunity to reflect on what we humans have done to our environment including our fellow people. With conservation and working together, not robbing Peter to pay Paul, we can be resilient.
973	Laurie Yglesia	What is the best plan? - No Tunnel! - Instead, Governor Newsom's Portfolio of other, better solutions for the state should be the focus: Groundwater recharge, desalination, recycling, and good old conservation (like replacing L.A.'s lawns with desert landscaping).. Why must our beloved delta pay for the selfishness of our southern state? This plan is absolutely outrageous and anyone who spent time on the delta, observing the many types of wildlife that call the delta home, who spent early mornings or quite evenings enjoying the outrageously beautiful sunrises and sunsets, wouldn’t dream of disturbing this God created piece of history. The families who rely on the land go back decades. The people that call the delta home, love this environment. Who ARE YOU to so much as consider stealing this vital piece of California from the people and critters that consider the delta home? Or from the thousands of visitors that come to visit our sanctuary each year. How long must this sit on a desk? Anyone in their right mind can see this is a political money grab with no care WHAT SO EVER about the damage to every vital living piece of the 1200 miles of waterways that make up the delta. Who in their right mind would even consider destroying the lives of Discovery Bay residents (or ANY OF THE DELTA COMMUNITIES).? Wrong thinking, money hungry, power hungry politicians who could care less about anyone but themselves.

976	Larry Hendrickson	The delta tunnel is not needed. Capricious waste of taxpayer money. A money making scheme by contractor friends of the Democrats. Moving water through a tunnel that already gets to the delta. What a travesty and waste of taxpayer money.
979	Paul Seger	Firstly, I am in support of access to water for all Californians Health. I am also in support of strict environmental conservation; I abhor pretending that man-made fixes for the abuse of Delta Conveyance being lauded as wise at any level of Governance. Continued, and increasing, flows South of Delta are unacceptable. As a Director for a small water district adjacent and in the Delta I have great concern for the State of California walking back it's previous number one priority for water, to make Water Conservation the Way of Life. Achieving Maximum water conservation goals for California must be the number one priority. A Comprehensive Study on Water [Districts & Municipalities] Providers' usage, rates and "extraordinary" efforts to achieve minimal water use by their customers. It is especially important to study and present AS Evidence of absolute necessity for life support [minus landscape and indulgent use] mandating additional exports from the newly proposed conveyance system. As Water Provider's have a multitude of pricing mechanisms making it nearly impossible for the lay-person to accurately understand How and Who is paying Exactly what for water delivery and use [and for what uses are critically imperative] that potable water be delivered. Rates need to be illustrated reduced to, Quantified Delivery, Price Structures and Price Signaling needs to be conducted prior to deciding just how much the minimum amount of water is needed for all use Regionally.
905, 906	Mark & Linda Lambert	As a long time resident in Discovery Bay, I am firmly opposed to any Tunnel projects. It will adversely affect our community and do irreparable harm to our environment. Please not tunnel(s).
989	Nancy Lindholm Oxnard Chamber of Commerce	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cfs of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. The project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta Conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.

990	John Heffernan South Bay Association Chamber of Commerce	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cfs of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. The project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta Conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.
991	Deborah Barmack Inland Action	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cfs of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. The project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta Conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.

992	William J. Wilson Rancho California Water District	Overall, I support the proposed project alternative for delta conveyance, one tunnel, sized to convey 6,000 cfs of water for the SWP agencies such as Metropolitan Water District of Southern California. While it is appropriate for the environmental process to examine a range of sizes, previous analyses have shown that smaller facilities do not proportionately reduce costs as opportunities to sufficiently capture high storm water flows cannot be achieved. Further, the proposed project and alternatives being evaluated should be "cost effective", meaning they must make economic sense for the PWAs that will be funding all of the costs. We believe a 6,000 cfs facility has the greatest possibility of accomplishing this need. I understand that the costs as compared to proportion of benefits goes up sharply as the capacity is reduced significantly below 6,000 cfs. Therefore the EIR should not evaluate alternative capacities that the PWA investors would have no interest in funding because the economic benefits and cost effectiveness does not exist.
993	Michelle Newell Ventura Economic Development Association	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cfs of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. The project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta Conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.

994	Thomas Flavin Burbank Chamber of Commerce	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cfs of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. The project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta Conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.
995	Donna Duperron Torrance Area Chamber of Commerce	Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cfs of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes. We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now. The project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta Conveyance project remains vitally important. We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta Conveyance project will provide.
997	Crisitina Mathews	This project expropriates not only these community's water, but their taxpayer dollars, using both for the benefit of remote corporations and their scorched earth agricultural practices. It is a subsidy that is not fair and that we cannot afford. I oppose this plan. Governor Newsom claims to value healthy ecosystems and climate resilience, but unless this water portfolio is radically revised, these claims are empty. I urge a change.

999	Tara Beeman	Can you imagine living in the exact middle of this proposed gigantic construction project, with 24-7 noise from trucks, heavy equipment and barges, ear-splitting pile driving and drilling, noxious fumes, mountains of sludge and supplies and dirt being slogged through on increasingly crumbled rural levee roads? This will be our lives in Hood for 10-20 years, our quiet rural Delta legacy community completely disturbed and destroyed, if this project is continued.
1000	Alphonsus Furr	This appears to be all decided without input from the local area. When you had your meeting your representatives were not interested enough to pay attention to our concerns. I wish we could enact legislation without any of your approval.
1002	Dr. June Dampin	I do not support one tunnel. It is just as problematic as two tunnels. It will destroy our precious Delta as a resource for fish, recreation, etc. Changing water levels downward will allow for desalinization of the water, destroying wildlife and affecting the water supply for San Joaquin and other counties.
1003	Judy Johnson	Moving large amounts of water from the north to the south and south central valley has been an answer to the ongoing challenge of water supply and distribution in California, and the proposed tunnel is being pushed as a way to facilitate this transfer. I feel very strongly that it is NOT a good solution. Large water transfers from one region to another is in direct opposition of California water policy to encourage regional resilience and economic and environmental sustainability. To further degrade the Delta and they Bay is absolutely not acceptable. Large works like dams and tunnels are not only expensive to build they also require ongoing expensive maintenance. That cost would undoubtedly be born by California taxpayers, at the expense of other much needed programs, and not by the big growers who would benefit from this proposed project. It is essential to have a no tunnel option.
1005	Stacy Sebring	I am against this project. It stands to drain the Trinity River even more than it is already drained by the CVP. The DWR must extend the scoping period, since their “scope” has been so narrow (not even one meeting in San Francisco). DWR must have more meetings up north where the source water is.

Table D-5. Comments Regarding the Project Description

Letter	Commenter Name, Affiliation	Comment Text
20	Bill Emlen Solano County	Due to both the massive, multi-county scale of the Delta Conveyance Project ("project") and the lack of detail in the NOP regarding the location and description of all project components, including ancillary facilities, and identification of the specific entities that would carry out project construction and operation, the County is unable to definitively provide specific details about the scope and content of the of the environmental information related to the County's areas of responsibility. It is unclear if project activities are planned in Solano County. If activities are planned in Solano County, it appears that discretionary County Zoning Code approvals may be necessary for facilities including, but not limited to, access roads, barge unloading facilities, concrete batch plants, fuel stations, mitigation areas and mining-related activities. Additionally, grading permits may be necessary. The County also has approval authority over geotechnical exploratory drilling, boring and construction of water wells and mitigation monitoring wells, road and highway encroachment permits, and building permits.
30	J. Mark Myles County of San Joaquin	Due to both the massive, multi-county scale of the Delta Conveyance Project ("project'') and the lack of detail in the NOP regarding the location and description of all project components, including ancillary facilities. and identification of the specific entities that would carry out project construction and operation, the County is unable to definitively provide specific details about the scope and content of the environmental information related to the County's areas of responsibility.
50	Michael Tognolini East Bay Municipal Utility District	The Project proponents' proposal to defer the development of an operations plan is likely to impair meaningful CEQA review of potential impacts on the Mokelumne fishery. The NOP states that neither a final operations plan nor determination of CVP participation could be completed until after the CEQA process, SWRCB water right hearings, and ESA consultation and review have been completed. Without an operating plan it will be impossible to determine the Project's potential impacts and their significance on species populations, particularly migrating salmonids. Fundamentally, how the State Water Project and Central Valley Project will be operated under the Project will drive the Project's water quality and fishery impacts, because such operations directly affect the quantity and timing of water moving through the Delta, and the quantity and timing of flow through the Delta drive fishery impacts. Thus, without a sufficiently defined operations plan as part of the Project, adequate environmental analysis cannot be conducted. The adequacy of the Draft EIR will be highly dependent on clearly presented operation plans and criteria based on all possible alternatives, including CVP participation. EBMUD would be pleased to provide independent verification of modeling results presented in the EIR. It would be helpful if the modeling assumptions and other information necessary to conduct fishery, water quality and operations analysis were readily available when the draft EIR is published.

55	Phillip Pogledich County of Yolo	Due to both the massive, multi-county scale of the Delta Conveyance Project ("project") and the lack of detail in the NOP regarding the location and description of all project components, including ancillary facilities, and identification of the specific entities that would carry out project construction and operation, the County is unable to provide specific details about the scope and content of the of the environmental information related to the County's areas of regulatory responsibility. It is unclear if project activities are planned in Yolo County. If activities are planned in Yolo County, it appears that discretionary County Zoning Code approvals may be necessary for facilities including, but not limited to, access roads, barge unloading facilities, concrete batch plants, fuel stations and mitigation areas. Additionally, grading permits may be necessary. The County also has approval authority over geotechnical exploratory drilling, boring and construction of water wells and mitigation monitoring wells, road and highway encroachment permits, and building permits, which are typically ministerial.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	If detention basin facilities are proposed, the DEIR should include a discussion of the basin design information (i.e., capacity, sizes of inlet and outlet structures, routing, etc.). A discussion of how maintenance of these facilities would be performed and funded should also be included.
136	Mike Ackley	Will your work help with the waterways filing in around Bethel Island?
136	Mike Ackley	I hear that southern water departments have purchased islands around Franks Track. How will that affect this project?
136	Mike Ackley	Can you use Bethel Island Scouts Hall or San Joaquin Yacht club for meetings and help up upgrade those locations?
136	Mike Ackley	What other things can we request that my help our community roadways, bridges, community centers parks, marinas?
136	Mike Ackley	Its a hard drive with bad roads and bridges from Bethel Island to highway five, Can that be improved?
136	Mike Ackley	There are docks and wreaks thought out the delta can they be cleaned up?
136	Mike Ackley	Is there any thing you can do to help us with problems with wees and sediment art Franks Track?
136	Mike Ackley	If we need you leftovers will you transport to locations no charge?

138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. The EIR must specify the exact location of all the construction disturbances and the final permanent facilities. These should all be delineated on clear, detailed large format maps. These include the following: • Exact location of the intakes, and the extent not only of the construction impact but the final land, towns, roads and buildings that will be impacted or lost; • Exact routes for both tunnel routes on maps that would clearly outline the corridors and islands that would be impacted; • Exact location of the construction "launch sites" and shafts used during construction and what will be left after completion; Location of the Intermediate Forebay and the final structures that would be there. • Location and size of the proposed pumping plant.
200	Jim Williamson	How big is the Delta compared to the inlet you will build for this 60 foot tunnel?
200	Jim Williamson	If you do calculations, this tunnel will take more water than 2 tunnels.
211	Lindsay Wood	The Sacramento River hydrologic system is out of balance. The four runs of Chinook salmon are crashing. On a good day, the Sacramento River runs an average of 3,500 cfs. Why does the tunnel carry so much water? The project has the capacity to divert the entire flow of the Sacramento River.
263	Chief Sisk Winnemem Wintu Tribe	With the Shasta Dam raise, how will the runoff water affect the levee system coming down through this planned conveyance? Also, are you sinking the tunnels into the Delta or building them up and over the Delta?
263	Chief Sisk Winnemem Wintu Tribe	What is the study for the damage that's going to be done to the Delta? Do you have that?
276	Emily Moloney Buena Vista Rancheria of Miwok Indians	Please explain which intakes you will be removing that these two intakes will be replacing. Please explain how this project will not increase the amount of water diverted from the Sacramento River.
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	Despite the substitution of a single tunnel for two tunnels, we do not see important changes in the conveyance plan since 2015.
435	Russel van Loben Sels	In describing the proposed project on page 3, you state, "final project operations would be determined after completion of CEQA and obtaining appropriate water right approvals from the State Water Resources Control Board's change in point of diversion process and completing the consultation review requirements of the Federal Endangered Species Act and California Endangered Species Act." This is unacceptable. It results in failure to adequately describe the project, disclose impacts, and design proper mitigation. Employment of adaptive management and the decision tree cannot be considered mitigation for the tremendously negative impacts the project may have on water quality and flows throughout the Delta. In order to understand this project and its impacts on Delta resources, final operations must be included in the draft EIR.

542	Bruce Campbell	The purpose and need included in the NOP specifically mentions to protect the reliability of water deliveries in a cost-effective manner relating to possible conveyance alternatives. Seeing "cost-effective" as a guideline, the main tunnel with other intakes, tunnel reaches, forebays, and pumping stations should be immediately ruled out as a possible preferred alternative.
549	Maggi Baum	I am concerned about the location of the intakes; it is very close to my property.

561	Diane Riddle State Water Resources Control Board	The EIR should include a clear project description in order to allow for a full project level evaluation of the potential environmental impacts of the proposed project. The EIR should specifically include proposed operating rules for the Project, including diversion limitations; criteria for operating the new facility in conjunction with other SWP, and as applicable CVP facilities, including Delta export facilities and reservoirs; bypass flow criteria; Delta outflow criteria; export to Delta inflow criteria; provisions for meeting existing water quality and flow requirements; and any other operating rules. The EIR should clearly identify and differentiate between existing regulatory criteria, proposed operating criteria, and modeling assumptions in a summary table or other easily identifiable format. Each regulatory criterion, operating criterion, or modeling assumption should be clearly explained and justified. Where flexibility is proposed, a range of potential operations should be evaluated from least to most restrictive. For example, given the uncertainty concerning CVP participation, the EIR should evaluate a range of possible scenarios, including no CVP participation, partial CVP participation, and maximum CVP participation. Any operating scenarios that are developed for the Project should adhere to all of the requirements currently in place under D-1641. One current D-1641 requirement is the Delta Export to Inflow (E:I ratio), which establishes a maximum percentage of the total Delta inflow that may be exported. The Delta E:I ratio is one of the water quality objectives for fish and wildlife beneficial uses (Table 3of the Bay-Delta Plan)that was implemented pursuant to D-1641. Both D-1641 and the Bay-Delta Plan specify how the Delta E:I ratio is to be calculated. In the BDCP/WaterFix Final EIR/EIS (2016), however, the calculation was modified by using a Delta inflow measurement location below the North Delta Facilities and excluding water diversions from the North Delta Facilities as a part of the total Delta export for purposes of calculating the E:I ratio. Any such changes in water quality objectives and subsequent operational criteria would require an amendment to the Bay-Delta Plan, and therefore all operating scenarios evaluated in the EIR should assume that the existing Delta E:I ratio, as well as other Bay-Delta Plan water quality objectives, would apply. DWR and Reclamation have pending petitions to extend the deadlines, which have expired, to maximize the beneficial use of water under their water right permits for the SWP and CVP, respectively. These petitions have been noticed and protested, but the Division of Water Rights has not processed them further due to a lack of environmental documentation. DWR and Reclamation may also wish to amend the petitions (the DWR petition only requests a time extension until 2015), which would require that the petitions be re-noticed. Although these petitions can be processed separately from a water right change petition for the Delta Conveyance Project, the EIR for the Delta Conveyance Project should address how the approval or disapproval of time extension petitions would relate to SWP and CVP operations with the new conveyance facilities. Specifically, the analysis of SWP and CVP operations in the EIR should be consistent with the fact that, absent State Water Board approval of time extension petitions, SWP and CVP exports, with or without approval of the new proposed points of diversion, are limited to the maximum amount of water put to beneficial use before the deadlines to maximize use contained in the permits.(See Wat. Code, §§ 1397, 1610.5; Cal. Code Regs., tit. 23, § 844.)

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	It is black letter law that, "[a]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." County of Inyo v. City of Los Angeles, 71 Cal. App. 3d 185, 193 (1977). An EIR must provide a clear explanation of the nature and scope of the proposed project, otherwise it "is fundamentally inadequate and misleading." See Communities for a Better Environment v. City of Richmond, 184 Cal.App.4th 70, 84-85 (2010). Here, the lack of clarity as to the role of the Bureau of Reclamation must be resolved before the DEIR can be issued. The NOP admits that the Bureau of Reclamation "may" have a role in the project, and that the objectives of the project "potentially" include water deliveries of the Central Valley Project. However, the operations of the Bureau of Reclamation are coordinated with the operations of the State Water Project pursuant to the Coordinated Operating Agreement, and the DEIR must have clarity as to Reclamation's operations and whether Reclamation will participate in the conveyance project. For instance, if the Bureau of Reclamation does not participate in the conveyance project, how will the State Water Project ensure no injury to the Bureau of Reclamation if Old and Middle River flows must be less negative, or Delta outflow must be increased, to offset and fully mitigate adverse impacts from operations and construction of new conveyance and the State Water Project? Similarly, how will the State Water Project ensure no injury to south of Delta wildlife refuges that rely on the Bureau of Reclamation for delivery of water that sustains endangered species and millions of Pacific Flyway birds? In addition, Reclamation's participation is likely to affect questions of sizing and operations of Delta conveyance that are essential to resolve before release of the DEIR. Similarly, DWR must ensure that the proposed project is reasonably certain to implement the proposed environmental flow conditions to maintain water quality and protect fish and wildlife, and the DEIR cannot lawfully rely on DWR providing a "proportional share" of such environmental and water quality measures, if the full measures are not reasonably certain to occur. See Cal. Code Regs., tit. 14, § 15126.2. NRDC et al raised similar issues regarding a lack of a stable and accurate project description in our January 6, 2020 comments4 on DWR's recent DEIR regarding operations of the State Water Project, which inconsistently described the role of the Bureau of Reclamation, and as a result, provided misleading analysis of the potential environmental impacts of the proposed project and alternatives. To comply with CEQA, the DEIR must provide a clear and consistent description of the Bureau of Reclamation's role in the proposed project and alternatives and ensure that all operational measures are reasonably certain to occur.
572	Katja Irvin	In the project description please describe the maximum amount of additional water the State Water Project (SWP) will be able to deliver to south-of-Delta contractors by avoiding pumping restrictions at the Harvey O. Banks Pumping Plant. Also discuss how pumping from both locations will be managed and coordinated and how this will change flows through the San Francisco Bay Delta (Delta) compared to baseline conditions, both the locations where flow will change and the amount of decreased (or increased) flows at each location. Furthermore, describe how flows will change when all projects listed under Cumulative Impacts below are completed.

572	Katja Irvin	In the project description and in the analysis of impacts under Energy and Green House Gas (GHG) Emissions, please describe and compare the energy use and GHG emissions required to pump water for the State Water Project under current operations vs. the future energy use and GHG emissions under tunnel operations including impacts from new water transfers that the Project will enable (analysis must use maximum feasible transfers).
572	Katja Irvin	Include in the project description a discussion (preferably a list) of all possible transfers that may use the Project in the future. Also, include a discussion (preferably a list) of all possible changes in water rights that may result in use of the Project to convey any additional water allocation.
576	Kelley Taber Sacramento County Water Agency	The Project description must provide sufficient and complete information about the ways in which DWR may operate the Project to enable an accurate and meaningful evaluation of Project impacts. The full range of potential operations must be identified, and the impacts of those operations assessed. The EIR must specify the quantity and timing of water to be diverted at the north Delta diversion, including the amount of outflow that may be needed to meet the needs of threatened and endangered fish species, and the quantity, the timing, or the source of water for any additional outflow, and how the SWP and CVP will be operated with the Project in place. Each of these operational aspects is essential to understand and draw meaningful conclusions about the Project's effects on the environment and water supplies in the Sacramento Valley and American River watershed.
576	Kelley Taber Sacramento County Water Agency	SCWA encourages DWR to modify the Project prior to release of the draft EIR to move the proposed intakes outside of an area that may adversely influence FRWP operations, or the Hood wells, and to coordinate and consult with SCWA as it develops the draft EIR to ensure that all impacts, including those identified in these comments, are accurately and adequately evaluated and fully avoided or mitigated.
598	Bill Emlen Solano County	As indicated in the NOP Project description, multiple facilities will be needed to provide support for the construction and operations of the Project. However, details on the location(s) and descriptions of all Project components including ancillary facilities to support construction and operations of the conveyance facilities including, but not limited to; access roads, barge unloading facilities, concrete batch plants, fuel stations, mitigation areas, and power transmission and/or distribution lines are not provided. As such, due to lengthy and massive scale of the Project, it's unclear to the full extent of potential impacts the planned activities, facilities, and operations will affect Solano County and its residents. Such detail must be in the NOP, as providing "sufficient information... to make a meaningful response" is mandated by law. (CEQA Guidelines section 15082, subd. (a).)

610	Henry Kuechler Reclamation District No. 2060	The NOP project description that says initial operating criteria will be formulated during the preparation of the Draft EIR is not sufficient to fully evaluate the impacts of the whole project. Construction and operation impacts will be extensive. Operational criteria can change as a result of processes outside of CEQA and impacts can change accordingly. If final operations can't be included in this CEQA process, they must go through a separate CEQA process to assess impacts to agricultural, environmental and domestic waters within and outside the Delta.
610	Henry Kuechler Reclamation District No. 2060	It is impossible to forecast the potential impacts of operations at this stage because the NOP doesn't include a specific plan for how the proposed conveyance system will be operated. Devote careful attention to existing conditions in the Delta as the plan is prepared.
610	Henry Kuechler Reclamation District No. 2060	The Delta Conveyance Project should put a stronger focus on measures to protect and improve Delta levees, including a greater role in flood management.
612	Warren Bogle Reclamation District 150	The NOP project description that says initial operating criteria will be formulated during the preparation of the Draft EIR is not sufficient to fully evaluate the impacts of the whole project. Construction and operation impacts will be extensive. Operational criteria can change as a result of processes outside of CEQA and impacts can change accordingly. If final operations can't be included in this CEQA process, they must go through a separate CEQA process to assess impacts to agricultural, environmental and domestic waters within and outside the Delta.
612	Warren Bogle Reclamation District 150	It is impossible to forecast the potential impacts of operations at this stage because the NOP doesn't include a specific plan for how the proposed conveyance system will be operated. Devote careful attention to existing conditions in the Delta as the plan is prepared.
612	Warren Bogle Reclamation District 150	The Delta Conveyance Project should put a stronger focus on measures to protect and improve Delta levees, including a greater role in flood management.
616	Larry Gardiner Brannan-Andrus Levee Maintenance District	The NOP project description that says initial operating criteria will be formulated during the preparation of the Draft EIR is not sufficient to fully evaluate the impacts of the whole project. Construction and operation impacts will be extensive. Operational criteria can change as a result of processes outside of CEQA and impacts can change accordingly. If final operations can't be included in this CEQA process, they must go through a separate CEQA process to assess impacts to agricultural, environmental and domestic waters within and outside the Delta.
616	Larry Gardiner Brannan-Andrus Levee Maintenance District	It is impossible to forecast the potential impacts of operations at this stage because the NOP doesn't include a specific plan for how the proposed conveyance system will be operated. Devote careful attention to existing conditions in the Delta as the plan is prepared, in particular the areas encompassed by the levees maintained by Brannan-Andrus Levee Maintenance District.

637	Osha Meserve Local Agencies of the North Delta	The level of detail in the NOP is inadequate to fully understand the proposed project, including both the proposed physical components as well as proposed operations. The planned volumetric capacity of the project and its alternatives must be clearly defined. During the time period under which a single or phased tunnel project was considered in 2018, engineers for the Metropolitan Water District ("MWD") explained that "In order to accommodate a higher flow rate in the tunnels, the original 2015 concept design of the pumping facilities, the facilities included in the Final EIR/EIS was modified. Examples included utilizing larger pumps and deepening the pump well structure to accommodate the larger pumping equipment."4If a 4,500 cfs tunnel can be modified to carry up to 6,000 cfs or more of water(as described by MWD), that means the project (now apparently proposed at 6,000 cfs) might also be later modified divert much more than 6,000 cfs. With the unending pressure to divert more water from the Delta, the Draft EIR must disclose and analyze the maximum amount of water that may be diverted from the Sacramento River by the project.
637	Osha Meserve Local Agencies of the North Delta	Proposed project operations must be provided in the project description. During environmental review of the CWF project, the EIRs presented various modeling scenarios that provided only a general idea of how the project might be operated, with retention of maximum flexibility for the operators. The vague operations description, along with constantly shifting approaches to modeling rendered the resulting environmental analysis of operations virtually meaningless.
637	Osha Meserve Local Agencies of the North Delta	The project description should also include details on the proposed role of adaptive management in defining future operations. Operation of the CWF included no input from affected water users and others within the Delta, with the adaptive management process only including the agencies, export water contractors and limited fishery organization input. There was also an advisory role for the Collaborative Science and Adaptive Management Program, which did not include any representatives from the Delta community or local agencies. This failed approach to operations and adaptive management must not be repeated. To the extent the project description provides operational flexibility and defers operational decisions, Delta stakeholders directly impacted by those operations must have a role in any adaptive management process.

662	John McManus Golden Gate Salmon Association	The lack of clarity as to the role of the Bureau of Reclamation must be resolved before the DEIR can be issued. The NOP admits that the Bureau of Reclamation "may" have a role in the project, and that the objectives of the project "potentially" include water deliveries of the Central Valley Project. However, the operations of the Bureau of Reclamation are coordinated with the operations of the State Water Project pursuant to the Coordinated Operating Agreement, and the DEIR must have clarity as to Reclamation's operations and whether Reclamation will participate in the conveyance project. For instance, if the Bureau of Reclamation does not participate in the conveyance project, how will the State Water Project ensure no injury to the Bureau of Reclamation if Old and Middle River flows must be less negative, or Delta outflow must be increased, to offset and fully mitigate adverse impacts from operations and construction of new conveyance and the State Water Project? In addition, Reclamation's participation is likely to affect questions of sizing and operations of Delta conveyance that are essential to resolve before release of the DEIR. Similarly, DWR must ensure that the proposed project is reasonably certain to implement the proposed environmental flow conditions to maintain water quality and protect fish and wildlife, and the DEIR cannot lawfully rely on DWR providing a "proportional share" of such environmental and water quality measures, if the full measures are not reasonably certain to occur. See Cal. Code Regs., tit. 14, § 15126.2. GSSA, NRDC and allies raised similar issues regarding a lack of a stable and accurate project description in our January 6, 2020 comments3 on DWR's recent DEIR regarding operations of the State Water Project, which inconsistently described the role of the Bureau of Reclamation, and as a result, provided misleading analysis of the potential environmental impacts of the proposed project and alternatives. To comply with CEQA, the DEIR must provide a clear and consistent description of the Bureau of Reclamation's role in the proposed project and alternatives and ensure that a102ll operational measures are reasonably certain to occur.
704	Eric Jenks Wilbur-Ellis Company	The EIR should clearly describe the proposed location of all Project components, including any launch shafts and ancillary facilities. This should include any area to be used for construction staging and material storage, as well as any "support sites" for deliveries, employee parking, batch plant, offices, or "RTM loading."3 If the EIR considers a launch site or other Project component adjacent to or that could impact W-E's Twin Cities facility, the project description should specifically identify the location, nature and duration of impacts. This detailed and specific project description is critical so that the EIR can fully analyze and inform the public, including Wilbur-Ellis and other affected stakeholders, how potential disruption or closure of the Twin Facilities facility will impact agricultural resources, traffic and transportation, air quality and greenhouse gas emissions, and will cause socioeconomic effects. For example, DCA's Central Corridor site plan for the Glanville Tract launch site depicts a "conveyor system" that connects to the property immediately north of the Twin Cities facility. But DCA's Eastern Corridor site plan for the Glanville Tract does not show any such conveyor system. It is unclear from the DCA site plans what impact this conveyor system would have on the Twin Cities facility under either the Central Corridor or Eastern Corridor alignment. The EIR should clearly describe this and all other Project components, and the EIR should analyze the precise location, nature and duration of impacts associated with this and other Project components.

710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	The EIR must include sufficient information about proposed Project operations for the public and ARWA to understand potential impacts. To address the interests of ARWA and the American River's fish, information about proposed Project operations must include substantial information about Folsom Reservoir operations and stream flows and temperatures in the lower American River. Accordingly, the EIR also must explain how the Project would operate under the COA, and affect accounting under the COA, if Reclamation participates and if it does not. Complete and accurate information about the range of potential operations is critical to evaluating a number of potentially significant impacts, particularly impacts to upstream water supplies and fish at all life stages. In particular the ARWA recommend that the Project description include a commitment to operate according to the terms for Folsom Reservoir management and lower American River stream flows that DWR included its CalSim modeling that supports DWR's recent draft environmental impact report for the SWP's incidental take permit, discussed in more detail below.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Forebays. The size and location of the Intermediate Forebay is a concern. The 30-foot-high embankments would place this feature well above the levee by potentially 10-20 feet and in sight for miles around the delta. Appurtenant structures and a permanent crane would bean additional 10 feet above the embankments. Again, ruining the natural aesthetic views of the Delta. The placement of this 250-acre intermediate forebay is also concerning. The last proposal had it placed right behind the elementary school in the small town of Courtland. If failure of that forebay should occur, the first to be hit would be the school, wiping out an entire generation for the families in Hood, Courtland, and Walnut Grove. This is poor planning and shows a disregard for this elementary school that over 90% of the students are on free or reduced cost lunch and the surrounding communities that all send their children to this school. The Southern Forebay and new pumping plant would also remove 1,125 acres of prime agricultural land out of production to store prior to connect to the already existing pumping plant and forebay of the State Water Project system.
715	Daniel Wilson Reclamation District 3	The NOP project description that says initial operating criteria will be formulated during the preparation of the Draft EIR is not sufficient to fully evaluate the impacts of the whole project. Construction and operation impacts will be extensive. Operational criteria can change as a result of processes outside of CEQA and impacts can change accordingly. If final operations can't be included in this CEQA process, they must go through a separate CEQA process to assess impacts to agricultural, environmental and domestic waters within and outside the Delta.
715	Daniel Wilson Reclamation District 3	It is impossible to forecast the potential impacts of operations at this stage because the NOP doesn't include a specific plan for how the proposed conveyance system will be operated. Devote careful attention to existing conditions in the Delta as the plan is prepared.
715	Daniel Wilson Reclamation District 3	The Delta Conveyance Project should put a stronger focus on measures to protect and improve Delta levees, including a greater role in flood management.

718	David Strecker San Joaquin Farm Bureau Federation	Forebays. The size and location of the Intermediate Forebay is a concern. The 30-foot-high embankments would place this feature well above the levee by potentially 10-20 feet and in sight for miles around the delta. Appurtenant structures and a permanent crane would bean additional 10 feet above the embankments. Again, ruining the natural aesthetic views of the Delta. The placement of this 250-acre intermediate forebay is also concerning. The last proposal had it placed right behind the elementary school in the small town of Courtland. If failure of that forebay should occur, the first to be hit would be the school, wiping out an entire generation for the families in Hood, Courtland, and Walnut Grove. This is poor planning and shows a disregard for this elementary school that over 90% of the students are on free or reduced cost lunch and the surrounding communities that all send their children to this school. The Southern Forebay and new pumping plant would also remove 1,125 acres of prime agricultural land out of production to store prior to connect to the already existing pumping plant and forebay of the State Water Project system.
720	Eric Gillies State Lands Commission	Project Description: A thorough and complete Project Description should be included in the Draft EIR in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all allowable activities (e.g., types of equipment or methods that may be used, seasonal work windows, locations for material disposal, staging and lay-down areas, as well as timing and length of activities, etc.). In addition, the Draft EIR should include the maximum area of impact, including loss of land and habitat due to flooding and the volume of sediment and vegetation removed or disturbed, inclusive of impacts not previously analyzed. The Draft EIR should also include figures illustrating the total footprint of the preferred and alternative projects(preferably aerial overlays),so that public agencies and the public can visualize the proposed Project effects on existing land uses. In addition, the Draft EIR should include engineering plans and detailed written description of activities. Thorough descriptions will facilitate a more robust analysis of the work that may be performed and minimize the potential for subsequent environmental analysis to be required.
724	Harvey Correia Reclamation District 2067	The NOP project description that says initial operating criteria will be formulated during the preparation of the Draft EIR is not sufficient to fully evaluate the impacts of the whole project. Construction and operation impacts will be extensive. Operational criteria can change as a result of processes outside of CEQA and impacts can change accordingly. If final operations can't be included in this CEQA process, they must go through a separate CEQA process to assess impacts to agricultural, environmental and domestic waters within and outside the Delta.
724	Harvey Correia Reclamation District 2067	It is impossible to forecast the potential impacts of operations at this stage because the NOP doesn't include a specific plan for how the proposed conveyance system will be operated. Devote careful attention to existing conditions in the Delta as the plan is prepared, especially RD 2067.

729	Erik Vink Delta Protection Commission	Move tunnel material suitable for levee improvements to willing reclamation districts. As noted under the agriculture section above, DWR's soil boring investigations should allow classification of the potential reuses of excavated material. If feasible, excavated tunnel material should be handled and stored in ways that segregate materials of different quality so they can more easily be reused. Material suitable for reuse to maintain or improve levees should be hauled to those Delta reclamation districts that want it. This would further the project's objective of anticipating rising sea levels and reducing the risk of levee breaches that may interrupt or degrade the quality of exported water, while diminishing damage to farmland and possibly modestly reducing the imbalance between the project's damage in the Delta and the benefits it provides there. Costs of hauling tunnel material to reuse sites should be borne by the project, rather than by those who may reuse it, as this mitigation measure is properly a cost of the project's contractors pursuant to Water Code section 85089.
730	Reclamation District 551	The NOP project description that says initial operating criteria will be formulated during the preparation of the Draft EIR is not sufficient to fully evaluate the impacts of the whole project. Construction and operation impacts will be extensive. Operational criteria can change as a result of processes outside of CEQA and impacts can change accordingly. If final operations can't be included in this CEQA process, they must go through a separate CEQA process to assess impacts to agricultural, environmental and domestic waters within and outside the Delta.
730	Reclamation District 551	It is impossible to forecast the potential impacts of operations at this stage because the NOP doesn't include a specific plan for how the proposed conveyance system will be operated. Devote careful attention to existing conditions in the Delta as the plan is prepared.
730	Reclamation District 551	The Delta Conveyance Project should put a stronger focus on measures to protect and improve Delta levees, including a greater role in flood management.
736	Kelley Taber County of Sacramento	The NOP describes two potential tunnel alignments. The "Central Corridor" option would run through the heart of the Delta agricultural communities and have devastating impacts to agriculture, recreation, wildlife (including sand hill cranes at Staten Island), not to mention significant community disruption from 16 years of construction traffic, noise, and pollutant emissions. The County is mystified as to why DWR elected to release the NOP with the Central Corridor as a Project option, given that well before the NOP was released, an independent technical review panel of leading tunnel experts engaged to evaluate the Project (ITRP) concluded that the Central Corridor alignment is "impractical" and thus the panel "does not recommend that it be studied further."
740	Ryan Hernandez Contra Costa County Water Agency	Due to both the massive scale of the Delta Conveyance Project, and the lack of detail in the NOP regarding the location and description of all project components, including ancillary facilities, the County and Water Agency are disadvantaged in our ability to provide specific comments about the scope and content of the Project's potential impacts to the environment in and around Contra Costa County.

743	The Environmental Council of Sacramento	Project needs to be defined clearly A significant concern with recent versions of this project (CA WaterFix, BDCP, etc.) was lack of clarity for what the project is. This culminated in an 11th hour series of such substantial changes that the Phase 2 WaterFix hearing needed to be extended in order to address them. DWR claimed that no additional environmental analysis was needed for these substantial changes because they had already provided such extensive analysis of possible permutations of the project. However, throughout the CA WaterFix and BDCP efforts, the actual project was not defined. A complete engineering level design needs to be prepared before any environmental analysis is undertaken. Continuing to design the project during and after environmental review will perpetuate the lack of clarity engendered previously.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	In addition to the threats posed to endangered and threatened species of fish by water exports, there are also adverse impacts on water flows, water quality and public health. The NOP only vaguely addresses these impacts by reciting probable significant environmental effects of the Project.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The NOP is oblivious to the fact that Delta urban waterways are stagnant and thick with algal scum and toxins, resulting in Harmful Algal Blooms (HABs). HABS can be easily found from Stockton to Discovery Bay with smaller ones becoming visible in sloughs between the cities. According to the EPA, HABs can: Produce extremely dangerous toxins that can sicken or kill people and animals; Create dead zones in the water; Raise treatment costs for drinking water; Hurt industries that depend on clean water (https://www.epa.gov › nutrient pollution › harmful-algal-blooms). Reducing freshwater flows by the Proposed project will increase the buildup of these dangerous algal blooms.
746	Friends of Stone Lakes National Wildlife Refuge	A complete detailed description of the project should be prepared, including an engineering-level design of all necessary components of the entire proposed conveyance system, prior to initiation of any environmental review. Work of the Delta Conveyance Design and Construction Authority (DCA) with stakeholders reveals that the tunnel design continues to be evolving. Environmental analysis should not be initiated until project design is finalized enough to disclose and analyze the probable environmental effects.
747	Jan McCleery Save the California Delta Alliance	Every expert I've heard on the subject of tunnel muck/RTM is in alignment with what the ITR Committee stated: "Based on ITR experience, soft ground tunnel material is not a commodity (has no residual value) and is difficult to dispose or find a use for. These two factors were part of the reasons the ITR recommends (above) moving the alignment closer to industrialized land, close to multiple modes of transport, to handle removal of it in the most economical manner. "

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The NOP proposes that Delta Conveyance Project operations would not be defined until after the CEQA process is completed (NOP page 3, paragraph 3). This plan to violate CEQA by not analyzing, disclosing or mitigating operations-related impacts in the EIR fundamentally violates the responsibilities of the CEQA Lead Agency to the point of malfeasance.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The NOP is fundamentally deficient by not disclosing the proposed operations of the project. It is not possible for the public to determine the extent of potential project impact to them without relevant proposed operations information being disclosed. Proposed Project operations description and disclosure must be included in a recirculated NOP and round of public scoping meetings.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Purpose and Project Objectives, paragraph 3, third bullet, "To protect the ability of the SWP, and potentially the CVP, to deliver water when hydrologic conditions result in the availability of sufficient amounts, consistent with the requirements of state and federal law, including the California and federal Endangered Species Acts and Delta Reform Act, as well as the terms and conditions of water delivery contracts and other existing applicable agreements." This statement is so poorly worded as to be unsuitable for use as alternatives scoping screening criteria. "Protecting" a Federal Project is not a viable objective for a State Project so that cannot be a screening criteria. "Sufficient amounts" is subjective and undefined and therefore cannot be utilized as an alternatives screening criteria. A project being consistent with state and federal law is a mandatory screening criteria for all projects as a project cannot plan to break the law.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 3, paragraph 3," Construction and commissioning of the overall conveyance project, if approved, would take approximately 13 years, but the duration of construction at most locations would vary ... " The NOP fails to identify specific areas of construction disruption and disruption duration. This vague description is inadequate to inform the public if the project may have an impact upon their quality of life, property or ability to earn their livelihoods. The NOP must be revised and republished along with new Public Scoping Meetings to disclose this essential information to the public.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 4, map -The map depicts Intakes and North Tunnels in Stone Lakes National Wildlife Refuge and partially east of 1-5. If that is not an accurate portrayal of the Proposed Project then this map is materially misleading and inaccurate and must be republished in a revised NOP. The scale of the map, approximately 400,000:1 is completely inadequate for meaningful or useful disclosure to the public for them to determine the location of the project relative to their location and livelihoods. The BDCP and WaterFix published Map Books with appropriate scale maps (1 :24,000) and background detail for the public to understand the location of the proposed project. The scale of this NOP map (17x smaller than the BDP/WaterFix maps) and lack of orienting detail included in it are materially deficient and a new NOP and round of Public Scoping Meetings must be conducted to correct this material deficiency.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 1, "The proposed intake facilities would be located along the Sacramento River between Freeport and the confluence with Sutter Slough, as shown in Figure 1. "This description and the map are inconsistent so one of them is misleading to the public regarding the nature and location of the project. Sutter Slough/Sacramento River confluence is downstream of Courtland. The intake highlighted area on the map stops 3 miles upstream of the Sutter Slough confluence. The highlighted intake area on the map stops where Randall Island Slough and Snodgrass Slough confluence would be with the Sacramento River. The north end of the intake area is also in conflict between the map and description. The map and description in the NOP are inconsistent and misleading to the public. A revised map and description must be published in a revised NOP. With the current and inaccurately represented locations, the EIR, at best, would be at a programmatic level which cannot be the basis for issuance of construction-related permits.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 1, "The size of each intake location could range from 75 to 150 acres, depending upon fish screen selection, along the Sacramento River and include a state-of-the-art fish screen, sedimentation basins, tunnel shaft, and ancillary facilities. An additional 40 to 60 acres at each intake location would be temporarily disturbed for staging of construction facilities, materials storage, and a concrete batch plant, if needed." The map figure does not show proposed locations of the intakes. The map shades a large and poorly defined reach of the river as the potential intake locations. With the proposed intake locations ambiguous and the size of the facilities varying as much as 100% it is not possible for the public to determine if they will be potentially affected by the project or not and supports only a programmatic level of impact analysis not sufficient to support construction-related permitting. A revised NOP must be issued that determines the type and design (e.g. over or through levee construction) of fish screen. Proposed, specific intake locations and project footprints that do not have an order of magnitude vary in specificity.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 3, "The proposed single main tunnel and connecting tunnel reaches would be constructed underground with the bottom of the tunnel at approximately 190 feet below the ground surface." The BDCP and WaterFix projects designed their tunnel for 80 feet below the ground surface. 190 feet deep is more expensive and generates more tunnel muck which creates additional increments of environmental impacts which must be analyzed.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 3, "Construction for the tunnel would require a series of launch shafts and retrieval shafts. Each launch and retrieval shaft site would require a permanent area of about four acres. Launch sites would involve temporary use of up to about 400 acres for construction staging and material storage." The map figure and description fail to disclose the proposed locations for these actions. These areas will require land seizures that displace property rights and use, people and livelihoods, as well as special status species populations; but are not disclosed in the NOP. As a result of this material information withheld from the NOP, the affected public remain ignorant and uniformed. A revised NOP must be issued that discloses this material information relevant to the location of these land seizures as well as specificity that allows the analysis of impacts to special species status populations.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 3, " ... this reusable tunnel material could be reused for embankments or other purposes in the Delta or stored near the launch shaft locations." The reusability or suitability of tunnel muck has not been determined. The time and area required for drying must be disclosed and analyzed. It is extremely unlikely that this material will have suitable characteristics to be useful for "embankments" intended to hold back water. The difference in environmental, land use and traffic impacts between reuse of tunnel muck on site or transportation to a disposal site is significant. The proposed project must specifically identify the location and describe and define where and how tunnel muck will be dried, used or disposed of in a revised NOP or the EIR may only be conducted at a programmatic level which will require subsequent environmental analysis, documentation and public participation prior to any project action.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 4, "Intermediate Forebay would provide potential operational benefits and would be located along the tunnel corridor between the intakes and the pumping plant." The location of this proposed large and environmentally disrupting facility is not disclosed in the description or map figure. The Intermediate Forebay will have a big impact that results in land seizures which have not been disclosed in this deficient NOP that fails to adequately inform the public and that must be revised and republished.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 5, paragraph 4, "The embankments would be approximately 30 feet above the existing ground surface." The Intermediate and Southern Forebays are functionally flow reregulating reservoirs. As such, the Forebay impoundments will always hold back water which is the definition of a "Dam" according to USAGE regulations. The NOP use of the term embankment is misleading and grossly technically inaccurate. A "dam" is something that holds back water most of the time, a "levee" holds back water only some of the time and an "embankment" is a meaningless term in this context that is not appropriate or relevant to the description of Forebay facilities. The Intermediate and Southern Forebays are dams and the engineering and construction specifications must be consistent with those requirements and evaluated in the El R impact analysis. The construction materials type, methods, labor, equipment, materials volumes and schedules for constructing a dam are radically different in environmental impact that just piling up some dirt in an "embankment" as implied by the inaccurate and misleading NOP description.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Alternatives, paragraph 2, "The scoping process will inform preliminary locations, corridors, capacities and operations of new conveyance facilities to be evaluated in the EIR." The NOP and Public Scoping Meeting materials and presentations were non-specific regarding the location of facilities and devoid of any water operations description other than theoretical range of flow capacity of the tunnel. The scoping process failed to inform the public on any intake operation tributary flow bypass standards, intake diversion operations daily intertidal variations in screen intake sweeping and approach velocities, reservoir operations changes to facilitate the project operations, the type of fish screens proposed, water supply delivery quantities that constitute the stated NOP objective to "restore water supply deliveries", excess transfer capacity created by the Project and many other material omissions to inform the public and decision makers for the alternatives scoping process. In every possible aspect of project description (location, size, type, function, design, artistic renderings, site design plans, operations), DWR either omitted critical information or was so non-specific as to be non-functional as a project-level disclosure in the NOP and public scoping meetings. The NOP and Public Scoping Meetings did not meet the CEQA requirements as stated in this quote from the NOP. The NOP and Public Scoping Meetings were deficient in their omission of project-level description and must be revised and redone in a subsequent NOP and public scoping process.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The Omission of Operations and Other Details of the Project Renders the Notice of Preparation Legally Inadequate. Guidelines section 15082, subdivision (a)(1) provides: The notice of preparation shall provide . . . sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response. At a minimum, the information shall include: (A) Description of the project, (B) Location of the project . . . , and (C) Probable environmental effects of the project. The NOP is inadequate since it does not provide “sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response.” In addition to numerous other omissions, the most glaring omission is the lack of any information on how DWR and the USBR plan to operate the project. Instead, the NOP begins and ends its “description of the project” with a very general (and inadequate) description of the physical components of the project. While the construction of the physical components of the project will indeed have substantial and devastating impacts on the Delta and other environmental resources, what will ultimately permanently destroy the Delta as we know it, and all of its environmental and other resources, is the operation of the project. The NOP is entirely devoid of any description of that operation thereby thwarting agencies and the public’s ability to meaningfully comment on the potential environmental impacts from those operations and any potentially feasible alternatives and mitigation measures to avoid or minimize those impacts.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	DWR's Failure to Disclose its Intent to Use the Project to Abandon the Maintenance of Adequate Delta Water Quality in the Wake of Sea Level Rise Renders the NOP Legally Inadequate and that Intent Confirms the Illegality of the Project. No where is the prejudice from the lack of any operational information more pronounced than with respect to the lack of any operational information whatsoever regarding how DWR intends to use the project to address sea level rise. Addressing "anticipated rising sea levels" is, of course, not merely an incidental component of the project; it is in fact one of the four primary objectives of the project (NOP, p. 2).
759	Dante J. Nomellini, Jr. Central Delta Water Agency	While entirely outside of the CEQA process and after over a decade of silence, in September of 2018, DWR finally revealed how it intends to operate the project to address sea level rise in its "Economic Analysis of the California WaterFix," dated September 20, 2018, and prepared for DWR by David L. Sunding, Ph. D. As revealed in that economic analysis, the fears of those who even remotely care about the well-being of the Delta, and the fears of those who are genuinely concerned that DWR will operate the tunnel in a manner that permanently and substantially impairs the Delta, were 100% validated by that analysis. In that analysis, DWR not only confirms its intent to use a tunnel to abandon maintaining adequate Delta water quality below the new north Delta intakes in the wake of sea level rise, but, even more egregiously, DWR asserts that the ability to abandon such maintenance is "one of the strongest arguments in favor of investing in the California WaterFix [i.e., in a tunnel]" and "alone is worth several billions of dollars." (Sunding, Economic Analysis, pp. 31 & 38.) In a nutshell, without a tunnel, DWR cannot abandon maintaining adequate Delta water quality in the Delta in the wake of sea level rise, or otherwise, even if it wants to, because DWR (and the USBR) export water from their intakes located in the southern part of the Delta and, hence, they need to at all times maintain adequate water quality at those intakes. The construction of a tunnel dramatically changes all of that. It removes DWR and USBR's export contractors' reliance on adequate water quality in the Delta and allows DWR and USBR to export high quality water from the northernmost portion of the Delta before it enters the heart of the Delta. Sure enough, the master, and entirely undisclosed, plan in the NOP, is to address the degradation of water quality in the Delta as a result of the anticipated sea level rise by simply allowing Delta water quality to degrade and exporting water that is necessary to offset that degradation through the tunnel to DWR and USBR's export contractors.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	While DWR's intent to use the project to abandon maintaining adequate Delta water in the wake of sea level rise is extremely egregious in its own right, at this NOP stage, DWR's failure to disclose that intent renders the NOP legally deficient. The NOP must accordingly be reissued with such a disclosure. Once agencies and the public are aware of that intent, they can meaningfully comment on the potential environmental impacts from the intended operations and potentially feasible alternatives and mitigation measures to avoid or minimize those impacts.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	Assuming that it is DWR's plan to operate the project in a manner that at all times maintains adequate Delta water quality in the wake of sea level rise: The EIR must thoroughly discuss and analyze how such maintenance will effect the amount of water available for export in the tunnel under all reasonably foreseeable sea level rise (and climate change) scenarios.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Assuming, on the other hand, that it is DWR's plan to use the project to abandon the maintenance of adequate Delta water quality in the wake of sea level rise: The EIR must thoroughly explain precisely how it plans to implement this abandonment of the maintenance of adequate Delta water quality. For example: – At what level of sea level rise will DWR decide to stop maintaining that water quality and start using the tunnel to export water needed to maintain that water quality? – Will DWR implement any mitigation measures to try to reduce the deterioration in Delta water quality as a result of exporting water needed to improve that water quality through the tunnel? – If so, precisely what measures will it be implementing? Salinity berms, salinity barriers, salinity gates, etc.? – What water quality will DWR try to maintain in the immediate vicinity of its north Delta intakes under all reasonably foreseeable sea level rise scenarios? – To what extent will DWR honor its water quality commitments in its "Contract Between the State of California Department of Water Resources and the North Delta Water Agency for the Assurance of a Dependable Water Supply of Suitable Quality," dated January 28, 1981?
759	Dante J. Nomellini, Jr. Central Delta Water Agency	DWR's Failure to Disclose its Intent to Use the Project to Abandon the Maintenance of Adequate Delta Water Quality in the Wake of Levee Failures Renders the NOP Legally Inadequate and that Intent Confirms the Illegality of the Project. DWR commits another fatal error by failing to in any manner explain in the NOP how DWR intents to operate the project to address levee failures. As with sea level rise, addressing levee failures is not merely an incidental component of the project. Instead it is one of the four primary objectives of the project (NOP, p. 2).

759	Dante J. Nomellini, Jr. Central Delta Water Agency	As with the manner in which DWR will operate the project to address sea level rise, there is nothing in the NOP that remotely describes how DWR intends to operate the project to address sea level rise. Fortunately, the CDWA has been able figure it out itself, and has determined that DWR's unmistakable intent is to once again use the tunnel to abandon the maintenance of adequate water quality in the Delta in the event of levee failures (just like it intends to do to address sea level rise), and export water through the tunnel that is needed to maintain that quality. That sinister intent is revealed when one considers that DWR is trying to address the situation where one or more levee failures cause the salinity at its southern Delta export intakes to become too salty for it to export from those intakes. Rather than allow Sacramento River fresh water to flow into and through the Delta to offset and any degradation of water quality due to levee failures, and restore that quality to adequate levels it deems worthy of exporting, DWR's plan under the project is to construct a tunnel and divert that freshwater directly into the tunnel thereby depriving the Delta of that much needed freshwater flow. The result is that DWR's plan is to not only stop maintaining adequate water quality in the Delta during levee failures, but even more egregiously, it plans to take available freshwater away from the Delta that could be used to restore that water quality and export it from the Delta through the tunnel.
767	Kelly Taber City of Stockton	The NOP provides no information on proposed Project operations, which are of critical importance and interest to the City, but does state that diversions could range from 3,000 cubic feet per second (cfs) up to 7,500 cfs. The Project description must provide sufficient and complete information about the ways in which DWR may operate the Project to enable an accurate and meaningful evaluation of Project impacts. The full range of potential operations must be identified, and the impacts of those operations assessed. The EIR must specify the quantity and timing of water to be diverted at the north Delta diversion, and how the SWP and CVP will be operated with the Project in place, given the coordinated operations of those projects. Each of these operational aspects are essential to understand and draw meaningful conclusions about the Project's effects on the Delta environment and the City's Delta water supply.
789	Jeff Henderson Delta Stewardship Council	The NOP includes a range of flow capacities and describes potential federal participation. These two topics should be further explained in the EIR project description and addressed to the degree possible throughout the EIR.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy ER P2 (Cal. Code Regs., tit. 23, § 5006) requires habitat restoration to be consistent with Appendix 3 (https://deltacouncil.ca.gov/pdf/delta-plan/2013-appendix-b-combined.pdf), which describes the many ecosystem benefits related to restoring floodplains. The elevation map included as Figure 4-1 in Appendix 4 (https://deltacouncil.ca.gov/pdf/delta-plan/2013-appendix-b-combined.pdf) of the Delta Plan should be used as a guide for determining appropriate habitat restoration actions based on an area's elevation. The NOP does not describe any habitat restoration associated with the Project, other than a general statement that other ancillary facilities may be built to support construction of conveyance facilities, including mitigation areas (NOP, p. 3). The EIR project description and/or mitigation measures should identify locations of proposed habitat restoration or mitigation sites, and the EIR should analyze the elevation proposed for each site in relation to current or long-term average water levels and best available science for projected sea level rise, documenting how the proposed restoration project is an appropriate habitat restoration action.
789	Jeff Henderson Delta Stewardship Council	In addition, the ongoing SEC meetings have informed the public about potential Project infrastructure (e.g., intakes, alignments/corridors, a southern forebay) with greater specificity than is included in the NOP. To the degree relevant, such information should be used to develop the EIR project description and should be analyzed in the EIR.
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: Project description with a sufficient level of specificity to quantify and analyze impacts to terrestrial species as a result of Project construction.
879	Inder Preet Singh Caltrans District 4	Figure 1 of the NOP does not appear to show the current alignment of State Route (SR) 4. Recommend updating this Figure to show current features.
918	Jan McCleery	The EIR needs to be readable. The BDCP/WaterFix EIR was not readable. It interspersed information about each of the multiple alternatives in one section, making it almost impossible to read through and find out the details about the preferred alternative. It was tens of thousands of pages!!! That's ridiculous. Normal people cannot absorb or process that much, excuse my French, crap.
918	Jan McCleery	The maps in the EIR need to be updated maps. For example, in many WaterFix maps, Mildred Island, an important anchorage bringing in boaters from throughout Northern California that then utilize South Delta mom & pop businesses and boat-related businesses, was never noted as an important anchorage. In some maps it was still shown as an island. In addition to that, update the Recreation section that was in WaterFix to list actual important boating recreation areas, like "The Bedrooms", "Mildred", the area around the Hilton's 4th of July 3,000 boat firework display so you can clearly show the impact (of the Central Corridor) on boating & recreation. Label important boating features. Do some homework. Label the islands on the maps. Show the roads, Show the existing communities. The maps are so lacking no one can tell what is being impacted. Add the marinas, important waterways, state parks, etc.

977	Karen Wilson	Identify specific flows required in the western San Juaquin Valley and southern Delta. Frequent monitoring now and future of dissolved oxygen so that temporary spikes are known, especially during low flows, and also to measure salinity, to comply with Porter-Cologne Water Quality Control Act.

Table D-6. Comments Concerning Implementation Considerations

Letter	Commenter Name, Affiliation	Comment Text
2	Lola Hunter	Governor Newson: my vote is NO! I grew up in the San Joaquin Valley in the 1950s and 1960s amongst the independent farms and dairies and for as long as I can remember Southern CA needed/wanted our water for their lawns, swimming pools and Corporate Farming. Why would we simply ship our water south at an enormous cost? Why not sell them our water and let them pay for the cost of delivery? Water is a limited resource!
17	Leland Frayseth	Additionally contractual review of the Delta Conveyance Joint Powers Authority, State Water Contractors and vendor agreements is required to purge all indemnification and liability limitations to simplify the work of a future judge and jury to award of damages and hold the managers, executives, board members accountable when an construction accident occurs as referenced in the LA Times article link above.
17	Leland Frayseth	I believe the $1.1 Billion for Oroville spillway repairs are still being funded by the good citizens of California that money needs to be paid back immediately. The $19.7M in DWR temporary Delta Conveyance Joint Powers funding needs to be paid back. Did you know Delta Stakeholders Engagement Committee members meet twice a month and are each paid a $250 stipend? That is $500 per person per month a California Water Commissioner is paid a $100 stipend per month. Did you know we are billed $47,250 monthly for Delta Conveyance Executive Director Kathryn that is 2.5 times Governor Newsom's salary? I get no value out of this work please ask your State Water Contractors to immediately pay it back to the state general fund.
24	William Burke County of Sacramento	Without conceding the applicability of any local permits to DWR, it is COUNTY'S understanding that the Delta Conveyance Project ("the Project") will be carried out on behalf of DWR by the Delta Conveyance Design & Construction Authority ("DCA"). The DCA's Joint Powers Agreement designates the Metropolitan Water District ("MWD") as the JPA's Government Code Section 6509 agency. (See May 14, 2018, Joint Powers Agreement Forming The Delta Conveyance Design And Construction Joint Powers Authority, § 4.3.) Thus, any and all procedural requirements that would apply to MWD in implementing the Project will apply to the DCA. (See Gov. Code, § 6509 [JPA's common power "is subject to the restrictions upon the manner of exercising the power of one of the contracting parties, which party shall be designated by the agreement"]; see also Cooper v. Mountains Rec. & Conservation Authority (.1998) 61 Cal.App.4th 1115, 1118; Zack v. Marin Emergency Radio Authority (2004) 118 Cal.App.4th 617, 628.)

53	Leland Frayseth	Please document the competency of your department and partners to take on the Delta Conveyance project in lieu of your recent Oroville spillway failure the environmental damage it caused and the continuing litigation by those harmed by the failure. Please dial in the court awarded damages and findings of the Oroville spillway failure into the Delta Conveyance EIR because future maintenance and operations issues will likely follow your past behavior. https://www.chicoer.com/2018/11/06/trial-date-set-for-oroville-dam-lawsuits-against-dwr/
54	Lisa Van Valkenburgh	I, personally, receive 40% of my water from the Delta. I'm sure that if the single tunnel plan goes through, the Santa Clara Valley Water District will increase my water bill significantly. This is not fair! We pay enough already!
82	Joanne Vinton	I'll be looking for detailed information about the equipment used to drill the tunnel and whether or not it is proven, i.e. has been used previously and successfully to build similar sized tunnels.
121	Petition: Save Our Salmon	The governor's water portfolio supports spending taxpayer money on new privately owned reservoirs and canals, and water transfers that would mainly benefit large agricultural corporations and water brokers, such as Westlands Water District. This is despite the fact that the state has already committed over a billion dollars of tax paper money to building new privately owned reservoirs and new freshwater diversions.
159	Jay Uhalt	After 33 years working in and all types of construction projects, dams and tunnels, the idea of a tunnel under the DELTA seems like a nightmare of problems and unforeseen cost over runs. Remember the newest Bay Bridge? The tunnel is a worse idea than the " high speed rail" project, and it above ground so you can see what's going on.
245	Richar Harasick Los Angeles Department of Water & Power	Clarify how governance of future project operations will be impacted by the conflict of competing interests resulting from multiple points of diversion, which will be regulated under a different set of rules at the new north intakes versus the existing South Delta point of diversion. In addition, clarify State Water Resources Development System water supply contracts as it is modified to incorporate the project and may impact funding obligations between several of the large state water contractors.
249	Bryan Griess Transmission Agency of Northern California (TANC)	TANC's comments should not be construed as authorization of, or acquiescence in, any particular uses of the COTP right of way for the purposes of implementing the project.
258	Barbara Barrigan-Parilla Restore the Delta	The public needs to know who's going to pay, and we need to know what the adjusted costs are with inflation, because the last estimate was based on 2018 dollars.
258	Barbara Barrigan-Parilla Restore the Delta	To our union brothers and sisters, please understand for every million dollars of public money spent, there are to jobs made. We have thousands of water projects to keep you busy in California. The tunnel will make 4 to 8 jobs. It won't solve the problem and the jobs won't be in your communities.

260	Todd Bloomstine Southern California Contractors Association	One of the issues I think should be clarified through this process is emphasizing that the tunnels would be used during high flows only.
282	Tim Stroshane Restore the Delta	Construction and operational impacts of the tunnel option should be fully evaluated in the DEIR for all issue areas and especially for flow.
332	Earl Jones	It's going to cost a lot.
349	David Scatena	I am concerned about the effects of the construction.
351	Dave Fries National Audubon Society, San Joaquin Chapter	Access and quality of individual use of the Delta for fishing, boating, birdwatching, hiking, photography, or just watching a sunset is guaranteed. This must include impacts on travel by road or by water caused by truck and barge traffic or other disruptions caused by construction and operation activities related to the project.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the cumulative impacts of the Delta Tunnel with the new Trump Administration Biological Opinions for the Trump Water Plan, the long-term operations of the State Water Project (SWP), the Shasta Dam raise project, and the proposed Sites Reservoir project. Would these new projects and rules be used to fill the tunnels?
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: • Impacts incurred during construction of the tunnel;
368	Corie Hamer	I'm really worried about the fact that you only want to take water during high-water events.
371	Mariah Looney Restore the Delta	I'm also very concerned about the construction impacts for Delta communities and the urban Delta area. There will be heavy truck traffic to all major construction sites, competing on I-5 and Highway 4 and through major arteries. Right now 30,000 people commute from Stockton to Sacramento, and 40,000 people commute to the Bay Area. Where are the regional traffic studies?
374	Tim Neuharth Steamboat Acres	So this project is astronomically wrong. It's wrong from its financial costs. If you don't believe me, see what happened to the Bay Bridge, the new Bay Bridge, where that cost originated from and where it now is, which is tenfold of where it started.
375	Russell Oans	Concerned about estimated cost versus final cost.
381	Peter Stone	Construction trucking during the construction period must have temporary roads provided that are not on the fragile levees.

382	Russel van Loben Sels	And the third item deals -- and I'll read it -- "Although initial operating criteria of the proposed project would be formulated during the preparation of the upcoming Draft EIR in order to assess potential environmental impacts and mitigation, final" -- "final...appropriate water right approvals through the State Water Resources Control Board's change in point of diversion process, and completing the consultation review will occur after the environmental impact [sic]." Those are all -- the operation of this project is fundamental to the impacts on the Delta and cannot be deferred. When you consider what happened with the California Water Fix, the decision tree and -- what is it -- the management of it cannot be determined after the fact. You need to consider that up front.
389	John Delgado	Why are we moving towards this project when there is no contract between water districts and as to who will pay and what the tunnel will cost?
390	Josue Garcia	I urge you to include in the EIR analysis of the economic benefits that this project and various alternatives will bring, both to the local communities where the tunnel will be actually built and the greater California economy as a whole, giving a substantial boost to the water reliability that the project will create. This analysis should include not just short-term economic effects during construction but also long-term economic effects following construction.
391	Meg Giberson	A cost/benefit analysis for this should be part of the NOP, and that should take into account the cost of environmental and social harms, not just, quote, the cost-effectiveness of the project to the public water agencies funding the project, which is in the literature currently.
391	Meg Giberson	Similarly, operational plans should be specified before permitting is complete.
391	Meg Giberson	A realistic timeline for all related activities should be included, since the tunnel length is supposedly 40 miles now, not 30 to 35 miles as what I read in the stakeholder engagement committee.
391	Meg Giberson	The finance authority also should not issue bonds that would cover any individual or multiple individual agency commitments to pay for the tunnel that DWR will not be covering.
394	Mariah Looney Restore the Delta	Which taxpayers are going to pay for the project, who will get the water in this water district and how much water will the water district actually receive? How much will the water district shift to permanent fees and property taxes rather than through water use? Regular rate payers deserve to know who they are subsidizing locally.
394	Mariah Looney Restore the Delta	How much will it cost when the construction starts? Construction costs are soaring. Because of construction costs and other elements, the tunnel will only make six to eight jobs per $1 million spent. And the jobs won't be in this community.

398	Stephen Rosenblum	Governor Newsom, in a recent interview, claimed that this project would create a lot of jobs. And that's total nonsense. It will create a lot of construction jobs, as the people from the union pointed out, but it will not create many long-term jobs. And many of the jobs it creates will be low-paying jobs that are not really career jobs.
410	Roger Thibault	Where is the water going to come from to make this fiasco feasible? The price tag will be double the amount being bantered about, just ask Boston and Seattle how their big digs went. Once the project is started the various water agencies will decry the price of the project and try to push the over run onto the taxpayer. What agencies with any credibility can be trusted to do the due diligence required to get at the truth of the cost and impact on the Delta/Bay? I remember when this first started and there was big talk about "mitigation" of all the problems the peripheral canal would cause and when push came to shove all the agencies that backed the plan had to admit there was no "mitigation" funding. If it were to have proper oversight it would become clear that a project of this size spread over the time it will take will destroy Delta communities economically and physically. You can't run loaded semi trucks over the levee roads for the time it will take to do this project without destroying towns like Locke and Walnut Grove to name but two.

461	Misa Joe	This is Winnemem Wintu territory. We support Governor Newsom's protest of Trump dropping the wild salmon from the plan, but I am here to say to you that the governor's protest is not enough to save the salmon if this water plan becomes real. For too long the federal and state government have paid close and solicitous attention to the interests of a few big ag businesses, about 100 families who farmed in the desert draining lakes and diverting rivers for irrigation. Less than 100 years later we see the result of their folly. Salinated fields that can no longer can grow crops and poisoning of the community's drinking water. These ag businesses cannot really be called farmers. They are changing from growing watermelon, almonds and rice to marketing and selling water, this water, and they want more. Privatized water in California means that the wealthy can buy taxpayer subsidized water and that are allowed to sell surplus water from their fields to the communities left without drinking water for a higher price and to oil companies for fracking, and we say enough. Accommodating this endless need of water for profit endangers the rivers and now the Bay Delta, the largest estuary on this side of the Pacific. We oppose these extreme projects. You don't even mention Shasta Dam raise. It will drown the Winnemem, and with its breaches it will destroy Redding and wreak havoc all the way to the bay. Building sites reservoir steals enough of the Trinity River, not an indirect thing to kill off important salmon runs as the Delta Single Tunnel Project that the governor is pushing will destroy the incubator of life, including our salmon runs, and will compromise the quality of life for all the cities 1 built around the Bay. It's time for the governor and his 8 administration to focus on what has been ignored too long, and that is our wellbeing from the mountains to the Bay Delta and taking care of the rivers, not feather the pockets of the rich so that the precious Bay Delta and the rivers of California and the salmon can keep flowing to the sea.
479	Margo Robbins	There's not enough water to grow watering crops in the desert. There's not enough water for fracking. There is enough water for salmon, for drinking, for swimming and for conscientious farming, not for big ag and sales.
484	Raven Stevens We Advocate through Environmental Review (WATER)	The water that flows from source areas is considered a public trust. This means that our water must never, must never be allowed to be sold for a profit. How will the EIR deal with for-profit companies like Westlands Water District who will make decisions that only benefit their for-profit schemes? Westlands provides water for corporate farms. These corporations farm on arid and now polluted lands which should be pushed into retirement from agricultural production. The EIR needs to analyze how district one benefits from the shipping of water out of our area to south. What are the real time mitigations in place to support water recharge areas where the water is source survived.

485	Atta Stevenson California Indian Water Commission	Increased water diversions clearly discriminates against small rural communities, jobs that healthy salmon runs give economic relief.
486	Tom Stokey Save CaliforniaSalmon	The Trinity River is at great risk because of cold water carryover storage. The new Trump Water Plan actually lies in the modeling about how much carryover storage there will be to the tune of up to 350,000 acre feet less, so what I'd like to see you do is provide some protection for the Trinity River and cop to the fact that you're harming the Trinity River by this project and by your ongoing operations, and that would include one of two options. The first option would be to flat out refuse to deliver any Central Valley Project water through state facilities through the tunnel, as well as through the Banks Pumping Plant. In lieu of that you need to have the Bureau of Reclamation amend their water rights before the state water board to provide protection for the Trinity River. That would include incorporation of the Trinity record of decision flows, Humboldt County's 50,000 acre feet and the lower Klamath record of decision, which I might add I would like to see all of those in your modeling as well, the Lower Klamath Rod, the Trinity Record of Decision and Humboldt County's 50,000 acre feet.
488	Frank Toriello We Advocate through Environmental Review (WATER)	This might best be accomplished stopping water deliveries to the Westlands Water District where evermore thirsty crops such as almonds are being planted mostly for export. A Westlands farmer has reported to district plaintiffs to convert most of their farmland into solar farms anyway. So this is about the water rights and enriching corporate interests, not about feeding America. This is not a complicated topic. This scheme is a scam to privilege the 350 entities in the Westlands Water District with more water rights at the expense of the health and wealth of the citizens of California.
497	Byron Nelson, Jr. Hoopa Valley Tribe	Modification of Coordinated SWP-CVP operations must fully account for, develop, and implement necessary measures for mitigation, restoration, preservation, and propagation of the affected fish species, habitat, and Indian Trust Assets. See letter for list of specific examples of protective and restorative measures the EIR should evaluate and ultimately adopt, including: Full funding and implementation of actions under the 2000 ROD. Augmentation of flows beyond the requirements of the 2000 ROD as necessary for preservation and propagation of fish in the Trinity and/or Klamath Rivers when conditions warrant. Etc.
499	Jacklyn Shaw	Delta River, Sierra Rivers, Delta East side, like Terminous recreation area and San Joaquin County with over 100 fresh food crops. If any pipeline (conveyance, tunnel, etc.) put on West side of Delta River... That meets agreements for only when wet. Meanwhile, salt makes more salt, drought cycles make more drought, forewarned to avoid Dust Bowl.

501	Richard	Where is all of this soil going to go when they dredge the tunnels? They bought the three islands. They're going to dump that stuff to these islands, and when the wind comes up, where's it going? Disco Bay. Look into this stuff because it's where it's all coming. It's coming to us. We have no say in it.
524	Linda Ormonde	Pumping water during high water events is not efficient management of facilities.
530	Kevin Romick Mayor, City of Oakley	What will the tunnel ultimately cost? Who will pay for it?
542	Bruce Campbell	A recent technical report by construction engineers for the Delta Conveyance Design Construction Authority estimated that it would take 23years or more to complete the DCP tunnel and associated infrastructure. That is partly because of the time it would take to get permits and build supporting infrastructure such as roads, train depots, barge-unloading facilities, large landings and more – as well as the new intakes and new South Delta pumping station. Those construction engineers pointed out that a lot more of this infrastructure would be needed to get a huge amount of equipment and piping to the Central Delta corridor if that one is chosen for the tunnel – as versus the more Eastern proposed tunnel corridor. Thus, there would be more GHGs emitted if the central area was chosen for the main tunnel (plus it would take longer), however it is sad to note that the more eastern alignment is fairly close to a number of sensitive receptors including some of the sizable Environmental Justice communities within the City of Stockton and in other communities in the region. The aforementioned sensitive receptors would be exposed to a lot of toxic emissions from at least 23 years of construction activities even if the Central tunnel corridor is chosen (seeing that it would take longer to build that one due to access problems),but the Eastern tunnel corridor would bring the emission sources quite close to Environmental Justice and other neighborhoods in Stockton and other towns in the region which would especially those with respiratory ailments in that area which is already prone to such even before construction may be gone on the tunnel-related infrastructure.
542	Bruce Campbell	If this is a time of economic depression which many see as likely, how will that impact funding of the major construction work in the Delta area part of the DCP project area?

560	Bradford Pappalardo Steamboat Resort	The ability to address the stability of the levee system and the dangers of a significant seismic event. While the construction impacts will be extensive; what about the operational impacts and the need to address existing conditions within the Delta; like the conditions of the levees within the system. The levees are a critical part of current and future water supply with or without the proposed project. A levee failure has caused a disruption in water supply in 48 years, since the beginning of the Delta Levee Subventions program. This program wasn't fully funded until the early 1980's but overtime and on a limited budget of $10 to $15 million per year, the system has undergone significant improvements and proven its reliability. The cost of bringing the levees up to a seismic standard should be evaluated as an alternative to the tunnel.
560	Bradford Pappalardo Steamboat Resort	Dewatering for construction of the intakes and tunnel is a particular concern for our operations as a resort. The resort is approximately 2 miles from the southernmost intake and is directly adjacent to Steamboat Slough. Any impacts from the dewatering that must occur to construct the intakes need to be fully evaluated. The cone of depression from such activities must be independently analyzed. We will be monitoring the level and quality of our well before this project begins construction and will hold the proponents of this project liable for any adverse impacts to our water supply or quality as a result of construction and operation. Furthermore, any impacts caused on the waterway will be closely monitored before and during construction as well as once operations begin. These will be considered direct impacts of the project and must be mitigated.

615	Justin Fredrickson California Farm Bureau	Policy Considerations—Foundational Tenets to Improve Prospects of a Potential Broadly Supported Delta Conveyance Solution: California's water system—including the way we convey water from north to south in the Delta—must address present and future needs and shortfalls in water supply. This includes sufficient water to meet satisfy senior water rights and to supply water of sufficient quantity and quality to meet the reasonable present and future beneficial needs of the natural areas and watersheds of origin, including the Delta. Waters that are surplus to the reasonable present and future beneficial needs of the areas of origin, and to the claims of senior water rights in these areas of origin, should be made available to areas of shortage outside of the areas of origin, for purposes including the continued production of agricultural products as well as avoidance or reversal of historic patterns of groundwater overdraft. This strategy should be pursued in wet years and during large outflow events, particularly, and when management conflicts can be avoided or minimized, as a means to meet the reasonable beneficial needs of these shortage areas. In their design and pursuit of short-, near- and long-term Delta conveyance solutions, whether jointly or separately, both the Department and United States Bureau of Reclamation must remain mindful of their legal obligations to state and federal water contractors, and should continue to meet regulatory and operational responsibilities in their coordinated operations of the projects, including responsibilities related to preservation of access to water of sufficient quantity and quality in the areas of origin.
615	Justin Fredrickson California Farm Bureau	The NOP suggests that the project could be completed in 13 years—but also suggests that the time required to construct distinct portions of the project could be shorter.4 To avoid, minimize, and reduce impacts, regardless of alignment, the Department might consider managed phasing over time, as a potential means to limit the extent and duration of impacts in any one area. Any long-term conveyance solution should be closely coordinated, or even expressly phased in combination with potential physical and operational interim projects and improvements to afford short- and near-term relief in water-stressed areas to the south.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	Proposed tunnel operations must consider increased economic and environmental costs that our local San Joaquin County residents will encounter if a Delta tunnel is constructed and operated. The new DCP is still under design thus costs for the project are in flux, adding to that uncertainty are mitigation cost changes associated with those design changes. Already there are significant differences between the central vs eastern route under consideration

629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	Beneficial reuse of removed sediments created when digging 190 feet below ground surface should be a priority so that these sediments do not end up in the San Francisco Deep Ocean Disposal Site and out of the natural system9. Available information indicate that tunnel planners should not solely count on reusing Delta sediments, removed during construction for shoring up levees or the new forebay to be constructed around the existing pumps. There is keen competition amongst northern California dredging projects for beneficial use reuse disposal sites and the DEIR should include plans to develop more beneficial reuse sites10. Delta sediments contain legacy mercury, arsenic, and chromium-6 and high levels are not considered safe for use near drinking water supplies. In fact, naturally occurring arsenic and chromium-6 in aquifers require additional costly treatment. It will be costly to remove, safely transport, and store such sediments to avoid becoming airborne dust (particulate matter) or leaching into drinking water sources. Safe disposal of tunnel-excavated soils will be a costly enterprise if not handled correctly due to negative environmental health outcomes both to human and wildlife.
638	Carol Moon Goldberg League of Women Voters of CA	We do not see that the full economic, social, and environmental costs and benefits of the project have been fully assessed regarding areas of water origin.
639	Theodora K. Atkinson	Concerned about cost of the tunnel
673	Jan Hagen	First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
680	Antal Kalik	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a “no tunnel” alternative and investment in water conservation and efficiency improvements to meet water supply needs. For ratepayers in Southern California, it is important that you have comparisons to a no-tunnel option in terms of financing.
692	Mark Goble	The twin tunnels of “Waterfix” were to be constructed with a Tunnel Boring Machine. An animated video once available on the Metropolitan Water District’s website, now removed, would require blade maintenance approximately every 4 miles. In order to accomplish this, the “Waterfix” project called for construction of underground “stations”, where a crater about 1 mile in diameter would be opened over the tunnel, and grouts injected to stabilize the stations. Every other “station” would become permanent. IF this process were to happen, the destruction of areas over the tunnel would be extensive. Subsidence over the Tunnel route is inevitable. injecting “Grouts”, depending on their chemical makeup, will contaminate groundwater in the area to an unknown extent.

692	Mark Goble	Tunnels that go through rock are more or less reliable, however, the research is lacking on this "reliability" when the Tunnel is not going through rock. In fact, liquification of the ground surrounding the Tunnel during a seismic event will require significant "grout injection" to stabilize the ground surrounding the Tunnel. Unless it is bored through solid stone, there is not enough data at this time about large tunnels during seismic events to conclude a Tunnel would fare any better than a surface levee. In fact, even with substantial "grout injections" the "liquification" of surrounding soil around the Tunnel could cause cave in, or complete Tunnel failure in a smaller seismic event, especially considering the nearby earthquake faults..
692	Mark Goble	Adding to the above ground destruction would be acreage for: the two "forebays", the construction staging areas, and the new roads to accommodate the steady stream of semi-trucks and equipment, as current roads are inadequate. Waste removal diesel trucks, some of which it is rumored would be working 24/7/365 for over 10 years, will be spewing emissions constantly throughout this time. If barges are used, Delta bridges will be opening and closing many times more than they do now, increasing wear and maintenance requirements.
692	Mark Goble	Construction noise and vibrations will destroy quality of life for nearby residents, and will adversely affect migrant bird, animal and marine life for a significant period of time.
692	Mark Goble	Lastly, if the Tunnel were built and put into service, the water removed from the "mix" of waters from all sources, will affect the water quality to all points south of the diversion point.
698	Steve Lambert Butte County Board of Supervisors	The DCP must clearly identify funding sources that are not based on speculation or assumptions. The funding of the DCP must clearly identify the increased cost to ratepayers. The DCP cannot assume the State Water Project Contractors have committed to providing funds for the construction and operation of new water facilities, as well as for mitigation necessary to address impacts to terrestrial and aquatic impacts associated with construction and operation. The State Water Project Contractors are continuing negotiations with DWR on financing the DCP. Despite the extensive negotiations agreement remains out of reach. As a State Water Project Contractor, Butte County would derive no benefit from the DCP and has gone on record opposing any financial obligation. Additionally, if the DCP assumes that other funding sources (e.g., federal government, state bond funds) would provide funding commitments for the DCP, those funding sources must be substantiated.
702	Frank Toriello We Advocate Through Environmental Review	This Delta Conveyance project MUST include permanent and effective solutions for returning the Salmon to the rivers above the Shasta Dam.

702	Frank Toriello We Advocate Through Environmental Review	The water that flows from source areas is considered a Public Trust. This means that this water MUST NEVER be allowed to be sold for a profit. How will the EIR deal with "for profit" companies, like Westlands Water District and their clients, who will make decisions that only benefit their "for-profit" schemes?
703	Gabrielle Broche	What is the operation of the term " efficiently conveyed"? Does it imply that there will be more water leaving the North State to be delivered to privately owned reservoirs, canals and water transfers paid by tax payers ?
705	Roger Mammon	During the construction period how will legacy communities be affected, will the residents and their properties be protected?
705	Roger Mammon	Will saltwater intrusion ruin the productivity of Delta agriculture and possibly destroy it? How will these decades old family farmers be compensated for their loss?
705	Roger Mammon	Has a cost benefit analysis been completed?
705	Roger Mammon	There are many environmental concerns surrounding construction from stirring up sediments with contaminants to air pollution, how are these being addressed?
705	Roger Mammon	Will Delta residents be forced to pay for a project that will negatively affect the lives? Where is the money coming from?
708	David Mooney Bureau of Reclamation	Given the coordinated nature of the Central Valley Project (CVP) and the State Water Project (SWP), Reclamation requests that DWR take all measures to avoid, mitigate, or offset potential Delta Conveyance Project impacts to the CVP. Potential impacts include annual and daily operations of the Delta Conveyance Project that negatively impact CVP water and power operations, any restrictions or financial commitments imposed on the CVP through permits or other regulatory approvals issued for the Delta Conveyance Project, and biological impacts attributable to the Delta Conveyance Project. In addition, Reclamation requests DWR continue to honor the addendum to the Coordinated Operation of the CVP and SWP agreement, specifically, recital 6. provides the following language, "…within 365 days of the implementation of new or revised requirements imposed jointly on CVP and SWP operations by any federal or state agency, or prior to initiation of operation of a new or significantly modified facility of the United States or the State or more frequently if so requested by either party, the United States and the State jointly shall review the operations of both projects."
708	David Mooney Bureau of Reclamation	Reclamation requests an initial plan that describes how DWR would operate the Delta Conveyance Project and comply with Federal Endangered Species Act requirements related to operations;
708	David Mooney Bureau of Reclamation	Reclamation requests a detailed analysis of the effects of the Delta Conveyance Project on the CVP.

714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs.
716	Muriah Kendall	What is the environmental impact from the Delta Conveyance Project? As it will support the continued increase of human population in California. This related population growth impacts on the environment of California as in housing, open space, watershed, pollution, etc. How much will growth in population affect the environment?
717	David Ledger Shasta Environmental Alliance	The EIR should consider whenever possible differing rates for crops that are high users of water compared to the amount of food or other plant product produced. Consideration should be given to requiring water districts to charge for water on this basis.
717	David Ledger, Shasta Environmental Alliance	The EIR should ensure that future water contracts the DWR makes with various water districts, corporations and other entities should be available to the public with a 90-day public comment period before the contracts are effective.
721	Michael McDowell Double M Farms	Costs associated with construction zones. These must include road and levee maintenance, greenhouse gas levels, and increase time and costs to residents. Road and levee impacts of the detour routes and not just of the construction zones need to be addressed as well. As construction occurs, traffic will use surrounding roads to avoid the construction zone. Before construction on the project starts, upgrades and additional structural support will be required on all surrounding roads that may be used as detour by residents. Then as the construction progresses, those roads will need to be maintained regularly and when the project is complete, a final replacement of those roads will need to be completed.
721	Michael McDowell Double M Farms	Consideration must also be given and addressed for residents who will bear huge additional costs in fuel and wear and tear on their vehicles.
721	Michael McDowell Double M Farms	I request the EIR analyze the impact of vibrations on centennial homes including multiple story, plaster walls, and those built on sandy soil and what mitigations the project must follow to protect these historic buildings.
721	Michael McDowell Double M Farms	I request that mitigation of this issue be addressed by establishing in the Delta at two or three Delta fire stations at least 4 full time EMT staff on a rotation schedule and EMT service equipment including ambulance and that all Delta fire stations to be staffed full time with a few firefighters to better respond to emergencies during this decade of construction.
721	Michael McDowell Double M Farms	I request the EIR include tourism loss impacts on the local economy.

725	Susan Wilson	The levee roads are narrow and fragile and cannot handle steady traffic of large trucks and heavy machinery that would be required on a daily basis for many years to complete the proposed project.
725	SusanWilson	The constant vibration of truck traffic, drilling, and other construction activity could collapse these already-fragile, historic structures.
725	Susan Wilson	The disruption caused by the construction, which will extend for many years, will disrupt the critical habitat for these birds. If the project were completed, it would also reduce the amount of wetlands available for these birds in the future – IF they would ever return to the area.
728	Jem Unger Hicks	Just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
729	Erik Vink Delta Protection Commission	Don't Make the Delta Pay DWR's water contractors must agree to reimburse affected Delta local governments and special districts for the lost property taxes or assessments for land used in the project's construction, location, mitigation, and operation, as required by the Delta Reform Act (Water Code section 85089). DWR should also anticipate reimbursing local agencies, many of whom operate on very modest budgets, when it calls on them for data or consultation during the preparation of the EIR.
731	Mark Pruner Clarksburg Fire Protection District	The buildings on the Clarksburg Fire District Property are vulnerable to the effects of the heavy construction pounding and other consequences anticipated to be employed to construct the Project. Heavy construction methods required could cause permanent damage to the buildings and improvements of the Fire District property.
731	Mark Pruner Clarksburg Fire Protection District	Construction methods must be analyzed, and alternative construction methods must be utilized as demonstrable mitigation, which will not damage the Clarksburg Fire District Property and its ability to accomplish the Mission of the Fire District.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must analyze whether, and how or how-not, the Project (including its construction, operation, and maintenance) would conflict with the District, the Mission of Clarksburg Fire and on District property.
732	Friends of the 1883 Clarksburg Schoolhouse	The Old Schoolhouse is a fragile structure, vulnerable to the effects of the heavy construction pounding and other consequences anticipated to be employed to construct the Project. The heavy construction methods required could cause the Old Schoolhouse to collapse.
732	Friends of the 1883 Clarksburg Schoolhouse	The EIR must analyze whether, and how or how-not, the Project (including its construction, operation, and maintenance) would conflict with the Old Schoolhouse Project.

736	Kelley Taber County of Sacramento	The County's significant local concerns include: Lack of enforceable assurances or protections for the County.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	An Accurate Statewide Benefit-Cost Analysis Must be Prepared and Disclosed in the Draft EIR Accurate economic information is required by both NEPA and CEQA. DWR must provide an accurate benefit-cost analysis to allow informed comparison by the public of alternatives to the proposed project that must be available throughout the period for public and decision-maker review of the Draft EIR. To select the preferred alternative before doing cost analyses would be to intentionally stack the deck in favor of the proposed project, and makes it impossible to fairly and adequately compare the proposed project with through Delta and no tunnel alternatives which are less environmentally degrading. The financial advantages of the through Delta and no tunnel alternatives are clear: through Delta conveyance already exists and studies show that investment in urban water conservation is generally less expensive that reliance on importing water.7 Conversely, the Tunnel Project would cost billions of dollars to construct over a 13-year period.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	DWR has never prepared a statewide benefit-cost analysis consistent with DWR's economic analysis guidelines. Instead, DWR's consultants prepare economic analyses narrowly focused on participating water agencies, a practice that has been going on for years. The State now has the opportunity to require an accurate statewide benefit-cost analysis. Up until now, Californians have been told that the beneficiaries of the proposed project would pay all costs. But even the State's own concealed economic analyses show that a substantial public subsidy would be required because the project costs would greatly exceed project benefits.
746	Friends of Stone Lakes National Wildlife Refuge	Impacts of pressurized flow in tunnels must be evaluated. The proposed project currently proposes one tunnel with capacity for up to 6000 cfs of water that would apparently not be pressurized. It is reasonably foreseeable that post environmental review modifications will be sought to increase potential water volumes by pressurizing the water flow. The environmental document must recognize that the proposed tunnel could be pressurized in the future to increase the amount of water pumped from the Sacramento River and evaluate the environmental impacts of the increased amount of water drawn through the intakes.
747	Jan McCleery Save the California Delta Alliance	As mentioned earlier, the Byron Tract Maintenance Shaft should be removed, and the tunnel should go straight south from Bacon Island to Victoria and then angle to the Southern Forebay. That way the tunnel then stays away from houses.

750	David Guy Northern California Water Association	As DWR embarks on its environmental review and planning for the Delta Conveyance Project, it should carefully develop criteria for operation of the proposed diversion facility that fully protects water supplies in Northern California, the supporting water rights and contracts, and area of origin protections firmly founded in California law. In addition, the Delta Reform Act of 2009 states that water rights shall not be impaired or diminished as a result of its provisions, including projects such as the Delta Conveyance Project.
752	Amber McDowell Double M Farms	Water loss and contamination. This project is really only one component of an overall system that is in great need of repair. With this project, no new water will be created, only transferred. Once this water is transferred to the aqueduct, a large portion of it will be lost due to the leakage issue of the aqueduct. I request that the EIR include the cost for canal improvement and if not, how the project will mitigation for the waste of water that should have stayed in the natural Delta ecosystem. In addition, the tunnel is not a securely enclosed tunnel and water leakage is expected. Taking untreated river water and putting it underground near the clean domestic water table will eventually contaminate the underground water basin that most of the Delta residents depend on for their daily domestic water needs including drinking. I request mitigation measures to be included in the EIR for providing a permanent source of clean, domestic drinking water to residents in each affected Delta town.
752	Amber McDowell Double M Farms	Tunnel construction is a specialized job that will require specialized workers. Those workers are not in California, so saying that this project will create Californian jobs in not correct. I request that the EIR include an economic analysis of the construction and engineering payroll for this project and which economy those workers' dollars will really go and including the lead engineer's, based on the current companies already identified or hired as the possible construction company and engineering firm to be used.
754	William L. Martin	An Accurate Statewide Benefit-Cost Analysis Must be Prepared and Disclosed in the Draft EIR. To proceed in the manner required by CEQA, DWR must provide an accurate benefit-cost analysis to allow informed comparison by the public of alternatives to the proposed project that must be available throughout the period for public and decision-maker review of the Draft EIR. The NOP states, "Cost analyses will come later in the process, after a preferred alternative has been selected." This statement makes no economic sense. The Draft EIR, at a minimum, must examine a "no tunnel" alternative. This examination must include a cost/benefit analysis of the "no tunnel" alternative. It may well be that a "no tunnel" alternative could provide the needed benefits at much lower cost, while helping to implement the Water Resilience Portfolio as described in Executive Order N-10-19.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	There should also be an economic analysis of whether the project is economically feasible in light of the anticipated need for more freshwater to flow through the Delta to maintain adequate water quality under each of those sea level rise scenarios and, as a consequence, a decreased amount of water available to export through the tunnel.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	In particular, assuming maintaining adequate Delta water quality in the wake of sea level rise will at times reduce the amount of water available for export to zero, the EIR must explain how DWR will meet health and safety needs of its export contractors via non-Delta water supplies during such times.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Also, in situations where DWR and USBR use up all of their available storage water to maintain adequate Delta water quality, the EIR must explain how DWR will nevertheless continue to maintain that quality through water purchases or other water sources and/or through measures such as salinity berms, salinity barriers, salinity gates, etc.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	the EIR must explain what will prevent DWR from changing it's mind and deciding to cease maintaining adequate Delta water quality and start exporting water needed to maintain that quality through the tunnel. Even if DWR starts out with good intentions, is there any conceivable method to physically prevent DWR from so changing its mind once a tunnel is built? If such a change is "reasonably foreseeable," then such a change must be thoroughly analyzed in the EIR.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Assuming, on the other hand, that it is DWR's plan to use the project to abandon the maintenance of adequate Delta water quality in the wake of sea level rise: (d) Because such abandonment will have devastating impacts on economic activities in the Delta, a thorough and detailed economic analysis must be prepared to assess the economic impacts as well as the secondary environmental impacts that may foreseeably result from such impacts.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Physical Capacity of the Tunnel: The NOP states at page 3: "Under the proposed project, the new north Delta facilities would be sized to convey up to 6,000 cfs of water from the Sacramento River to the SWP facilities in the south Delta . . . ." The EIR must thoroughly explain how easy or difficult it would be for DWR to subsequently increase that capacity to 9,000 cfs or even 15,000 cfs or beyond, in the event DWR obtains initial approval of a 6,000 cfs facility and just happens to decide at a future time that it would like to increase that flow rate. In this regard, the EIR must thoroughly explain the maximum theoretical physical capacity of the main tunnel itself. In other words, assuming additional intakes were brought on line in subsequent years and assuming additional pumping facilities were brought on line at the southern end of the main tunnel, what is the maximum cfs of flow that could theoretically be moved through the proposed tunnel?

759	Dante J. Nomellini, Jr. Central Delta Water Agency	Water Transfers: Because DWR intends to use the project for water transfers, the EIR must thoroughly discuss and analyze the full range of potential environmental impacts from such transfers. Such a discussion and analysis must include an examination of where and how the transferred water would have been used in the absence of the project and a comparison of where and how it will be used with the transfer. The breadth of potentially significant impacts is substantial. Impacts on all essentially all aspects of the environment are potentially affected. Impacts to groundwater and groundwater basins are a particularly sensitive topic. Legal restrictions on the direct or indirect export of groundwater via a water transfer must also be discussed and analyzed, including but not limited to Water Code section 1220.
776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	While the project facilities proposed in the new project as elements of the SWP lie outside BCDC's jurisdiction, the construction and operation of the new facilities may have impacts farther down the Bay-Delta system on the water quality and natural resources of the San Francisco Bay and Suisun Marsh. These impacts may include changes to water quality, water quantity, salinity, and sediment transfer. Though not mentioned in the NOP, elements of the SWP that may be located within BCDC's Suisun Marsh jurisdiction could be expected to include physical facilities operated by DWR and regional partners under the authority of BCDC permits. Changes to the operations of these facilities may require updates to those permits.
806	Clifford Sanburn	Anyone with an even cursory knowledge of science knows that a marine estuary system, especially a stressed one like the Delta is never made healthier when less water flows through it. Flooding would be better! At least it is a naturally occurring cycle. You should dismiss any of these follies out of hand. Monied interests (from massive Southern California water districts) and farmers have clouded the issue with a false and incomplete set of choices.
809	Martin Freitas	Government authorized that water would only be taken from the southern most section of the Delta, specifically where the current forebay is located.
824	Christine Ellis	If we allow the delta bypass tunnel, pipes, and valve system to be built, then this opens up new opportunities for exploiting California water resources in the future. Companies with deep pockets and distant from their target will exploit this new "gold."
873	Barbara Chapman	These are my questions: With what water will future Delta tunnel and dams and reservoirs be able to operate?
873	Barbara Chapman	With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?

873	Barbara Chapman	Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
874	Bill Hartman	Water is extremely important to all of California. The Delta is important and fragile. The Delta has been abused and misused drastically by both the State and Federal Water Projects. Something does need to be done to manage the Delta water transfers better. However, the Tunnel or Tunnels are only to stoke certain egos. They are an environmental disaster: the construction will destroy the Delta, the maintenance costs will be astronomical, and they will be irreparable if damaged.
874	Bill Hartman	The cost to rebuild all of the roads, displace the local traffic and residents, pump out the flooded island and reconstruct the miles of damaged levees needs to be included in the project plan and not ignored.
880	Muriel Strand	Factors to be considered for a complete and robust analysis of this project include: 4. How will the energy for operating this project be acquired without the use of fossil fuels?
885	Claudia Mackey Restore the Delta	I believe that Restore the Delta speaks for those of us living in the Stockton Delta area, and as such, I am in accord with the comments they have made, to wit: This comment conveys my views on the Notice of Preparation (NOP) for the Delta Conveyance Project (DCP) issued January 15, 2020, by the California Department of Water Resources (DWR). I seek to put before you a few key questions and our discussion of them: - With what water will future Delta tunnel and dams and reservoirs be able to operate?
885	Claudia Mackey Restore the Delta	- With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?
885	Claudia Mackey Restore the Delta	- Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
887	Scott Mondloch	This letter conveys my concerns on the Notice of Preparation (NOP) for the Delta Conveyance Project (DCP) issued January 15, 2020, by the California Department of Water Resources (DWR). This letter also seeks to put before you a few key questions and our discussion of them: With what water will future Delta tunnel and dams and reservoirs be able to operate?
887	Scott Mondloch	- With what water will future Delta tunnel and dams and reservoirs be able to operate?
887	Scott Mondloch	- With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?

887	Scott Mondloch	- Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
933	Charles Robinson	* Include a specific, quantitative account for where and when the water to be conveyed will come from: which watersheds, waterways, reservoirs will be drawn from at what time of year.
975	Craig Burger – Commodore, Sea Ray Boat Club of Northern California	The Sea Ray Boat Club of Northern California is a group of local Sacramento-San Joaquin Delta residents who are active boaters, business people and voters who recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration. We fight for a Delta whose waters are fishable, swimmable, drinkable, and farmable, supporting the health of the San Francisco Bay-Delta Estuary, and the ocean beyond. Our members envision the Sacramento-San Joaquin Delta as a place where a vibrant local economy, tourism, recreation, farming, wildlife, and fisheries thrive as a result of resident efforts to protect our waterway commons. This communication conveys our comments on the Notice of Preparation (NOP) for the Delta Conveyance Project (DCP) issued January 15, 2020, by the California Department of Water Resources (DWR). This letter also seeks to put before you a few key questions and our discussion of them: With what water will future Delta tunnel and dams and reservoirs be able to operate? Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes? With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs? Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
977	Karen Wilson	Trinity River naturally joins the Klamath and flows out to sea. Interested parties to any use of it's waters need to have a voice. Include me. What water is presumed to be available for DCP? What are the presumed base parameters for maintenance and repair of existing infrastructure, including levees? Selenium, whether from soil or otherwise needs close monitoring now and in future. While CEQA process is implemented, what increased monitoring is planned to protect the water, a public trust resources of state?

Table D-7. Comments Regarding Consistency with or Relationship to Other Process, Plans, Program or Policies

Letter	Commenter Name, Affiliation	Comment Text
29	Hope Salzer	The tunnel environmental impact report (EIR) should consider the following: The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
32	Robin Durston	A tunnel wont resolve the drought problems coming with climate change and will not bring water use and available water into reconciliation. (We still promise more water to users than actually exists.)
32	Robin Durston	A Bay-Delta Water Quality Plan has not been implemented, and the proposed models for the Voluntary Agreements to set flows into and through the Delta reveal less available freshwater for the estuary.
32	Robin Durston	The Newsom administration has not yet filed its lawsuit against the Trump administration's corrupted biological opinions, the rules for how water export pumps operate to protect fish.
32	Robin Durston	The California Aqueduct is sinking as a result of groundwater pumping by big agricultural users according to a report released by the Department of Water Resources on December 31, 2019 and will require costly repairs on top of the costs for the tunnel
32	Robin Durston	A tunnel does not protect the Delta's 4 million people from extreme flood threat from climate change
32	Robin Durston	"We have consistently maintained that regional sustainability projects found in Governor Newsom's Water Resilience Portfolio should be prioritized to reduce dependence on Delta water exports before moving forward with the tunnel. Instead, we have crucial Delta needs once again taking a backseat to a project that Californians do not want – especially on the heels of the Trump water plan."
48	Libby Lucas	While commending Roman water supply and hydrologic engineering which survives today, do suggest NOP incorporates their philosophy of providing water for common citizen over discretionary uses of wealthy landowners. Dry farming is feasible in valley.
48	Libby Lucas	Finally, the dramatic decline in native fish species that migrate through and inhabit the Sacramento River needs to be addressed in establishing seasonal base flows, especially for spring and fall run Chinook salmon. Stream temperature criteria for this cold water fishery will be more challenging to maintain with global warming, so it is vital to preserve full stream canopy in the Sacramento River.

50	Michael Tognolini East Bay Municipal Utility District	The Project must also address a likely conflict with EBMUD's future cross-Delta tunnel (EBMUD Delta Tunnel). EBMUD owns the land and subsurface rights along the alignment of the Mokelumne Aqueducts ROW, and is planning for the EBMUD Delta Tunnel with an outside bore diameter of approximately 20-feet to replace its existing above-ground aqueducts. Attachment 2 shows the extent of the EB MUD Delta Tunnel. The conceptual design for the EBMUD Delta Tunnel is complete, and based on an extensive geotechnical exploration program completed in 2019, that design places the EBMUD Delta Tunnel within an elevation range of -80 ft msl to -130 ft msl (NA VD88 vertical datum). The EIR must address this reasonably foreseeable conflict and the environmental impacts that could result from failure of either or both of these facilities if the Project is not adequately designed to avoid adverse impacts to EBMUD's Delta Tunnel. These impacts could include a vertical alignment (elevation) of the Project that directly interferes with the EBMUD Delta Tunnel, in addition to potential groundwater seepage, ground loss, undermining, settlement, heave, vibrations, and tunnel exfiltration during construction or long-term operations of the Project.
61	Janice Gloe	I also strongly oppose the raising Shasta Dam! Please consult with Chief Sisk about the damage that it will cause! It will destroy more sacred sites of the Winnemem Wintu People! It will have long term damaging effects to the environment, not only for the Winnemem Wintu people but for everyone!
64	Eric Kueneman	With respect to provision of questions and comments from the public, I think it would be appropriate that we couple dialog on infrastructure options to thoughtful water-use policy. For example, given results of the climate change studies forecasting we know there will continue to be demand for use of Central Valley groundwater for agriculture purposes. Without changes in practices we will deplete groundwater resources. We need to foster processes to replenish these waters by putting water back on many fields in during the winter months, perhaps with use of cover crops and reduced tillage approaches to cropping. Even some of the land under perennial crops could be winter irrigated to put water back in the groundwater when water it is relatively plentiful. I would encourage broadening the dialog so that California has sustainable solutions and good practices.
81	Jan Warren	You must include a comprehensive funding source and implementable plan that increases water storage, restoration of drained aquifers, recycling and conservation.
104	Paul and Lynda Roy	I want to see a specific plan developed to prevent this: mandatory agricultural conservation practices; added storage reservoirs; improved recycling practices.
116	Virginia Phelps	As a second point of public input, I would like to ensure the State is informed about a series of water projects being undertaken throughout the Sacramento and San Joaquin Valleys titled The Multi-Benefit Flood Protection Project. Its website can be found at https:www.multibenefitproject.org/. The projects are either planned or completed with goals of improving water quality, replenishing groundwater, expanding public recreation opportunities, increasing flexibility for reservoir operators, and strengthening resilience to extreme weather events due to climate change. The Nature Conservancy is conducting a Multi Benefit Pilot Test groundwater recharge project in Colusa County next Fall.

116	Virginia Phelps	#3 Where Does the State's Precious Water Go? [Letter includes link to a video on YouTube called, Treading Water.] [Letter includes reference to the National Geographic documentary, "Water & Power: California Heist"] Wise use for equitable purpose is crucial. You have an enormous responsibility.
121	Petition: Save Our Salmon	In early January, California's Governor Gavin Newsom released his highly anticipated California Water Portfolio. Even though the portfolio discusses prioritizing restoration and water savings, it also prioritizes the three most controversial and environmentally destructive threats to California's rivers; the Delta Tunnel project; The Sites reservoir project; and voluntary agreements for agriculture.
121	Petition: Save Our Salmon	The portfolio even suggests accelerating environmental permitting for new the Sites Reservoir and diversions, despite the fact that fisheries in the areas targeted are facing extinctions and agencies have warned of potentially devastating fisheries impacts. Only two of the "listening sessions" for these meetings happened north of Sacramento and no hearings happened in Northwest or Northeast California, from which much of the water the state uses is diverted. Most California Tribes and counties of origin were not consulted on the portfolio.
121	Petition: Save Our Salmon	The governor has also not followed through with his promise to sue the Trump administration for their new water plan and biological opinion. These Trump plans will most likely force many of California's salmon species into extinction and decimate the fishing industry. California released a state alternative to this plan that also threatens California's fisheries and drinking water quality by diverting more water. The state again failed to value public opinion by only holding one daytime hearing in Sacramento on this water plan.
136	Mike Ackley	Who will control how much and when you can take water?
145	Meredith Cooper	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
147	Petition, Save Our Salmon	The petition states that Californian's are saving water and support conservation to save the environment. The petition lists the following state and federal processes that threaten California's Rivers: The Trump Water Plan for Long Term Operations of the Central Valley Project, Shasta Dam Enlargement, The Long Term Operations of the State Water Project, The Proposed Sites Reservoir, The Twin Tunnels proposal, which is now the One Tunnel, The Westlands Water District and other CVP water district permanent water contracts, The Governor's Water Resilience Portfolio. This document lays out the Governor's water priorities and the one tunnel proposal and Sites Reservoir are top priorities in the document. These projects are all connected as the Sites Reservoir project and its new diversions, the Trump water plan, and the Long Term Operations of the State Water Project would allow more water to be diverted and stored from the Trinity and Sacramento River systems and Bay Delta, and the tunnel would allow this water to be moved south. The Governor's water portfolio and Trump actions make sure all of these new reservoirs and diversions are prioritized on the state and federal level above salmon and communities.

154	Jacklyn Shaw	Why did DOI, Reclamation approve Desalination grants for 16 states, but not for California? TV news reported forest fires. Department of Interior, DOI, Bernhardt was former assistant/lobbyist to Fiji Water man of Westlands, near Hanford (known for dune buggy racing). Pres. Trump put a hold on Tunnel travesty plan, a month, after facts were shared on drought by DOI, Reclamation staff. He had met in Bakersfield, Kern County, formerly with grander Yosemite waters (Hetch Hetchy dam exports to San Francisco). That was to keep his promise to farmers, but that is over 300 miles south of a Delta tunnel, and only signifies the southern tip of 28 counties in Central Valley. Bakersfield Basic provides for desalination. DOI Bernhardt said that he can control the flow or " spigots". We have heard that bureaucratic talk before. "Who ya gonna call?" Where is simplified contact for voices in timely, local citizen advocates?
171	William Roltsch	Appropriate demands of current and anticipated future water usage need to be addressed. Southern California population continues to grow and generally is unsympathetic to the natural resources of northern California where the water resource exists. This is also true of a good deal of the State's agriculture. Is more new land being put under plow on the east and west edges of the Central Valley, with sustained if not increased demand of water for agriculture, even as the State's population grows? Orchards seem to be appearing in previously uncultivated land. Limitations must be acknowledged in the EIR.
195	David Fries Conservation Chair San Joaquin Audubon Society	The Delta Reform Act mandates that best available science must be used in all planning and approval considerations for the new conveyance project.
241	Ann Dorsey	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
251	Loren Rhodes	With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?
255	Sandy Rhodes	With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?
258	Barbara Barrigan-Parilla Restore the Delta	The statements that the project won't take any additional water are not accurate and forthright. The new biological opinions and the long-term operations agreement are being set up to increase exports and decrease flows, so it doesn't matter if it's in the project. It's being done elsewhere.
258	Barbara Barrigan-Parilla Restore the Delta	There is no discussion in the NOP of Delta protections. Those decisions are being outsourced to other agencies, including levies, flood control, water quality. They'll be funded at a lower level, and they will be last in the list of things to get done by the state after the tunnel. That is not a co-equal goal strategy.

262	Regina Chichizole Save California Salmon	The water portfolio seems to tie the Sites Reservoir project and the Delta tunnel projects together. I know there are other proposed new reservoirs in the state that are just called water storage projects, but in reality, they are going to take a lot more water out of our rivers at a time when our salmon are dying off at extremely quick levels. During the drought, we lost about 99 percent of winter-run Chinook in the Sacramento River, and we lost about 95 percent of juvenile salmon in the Klamath River. And I know that the map only shows the Trinity River as a diversion, but for us, it's a river, and we really depend on it in order to keep the Klamath River salmon from dying off, because it's one of the coldest water sources. Cumulatively, these new projects such as Sites, the governor's water portfolio, the Trump Water Plan, the state water, could be death to our rivers. The governor needs to look at sustainability.
262	Regina Chichizole Save California Salmon	Right now there is so much paper water in the state that in the Trinity, there is ten times more water rights than exist in the river. In the Sacramento, the numbers are almost similar. So it doesn't matter if there is no new water rights, because there is not enough water to fulfill the current rights. So if we build more dams and we build more diversions, we're going to kill off our salmon and we're going to ruin the water quality that we rely on for the jobs and for the people of the state. So we're opposed to this project.
265	Molly Culton Sierra Club of California	The EIR must also analyze the tunnel's consistency with the Delta Reform Acts policy of reduced reliance on the Delta in conjunction with the state's operations proposal.
266	Michael DiMartino Alliance for Resilient Communities	Why is there not a more effective water management program in place that takes in all the various factors from the dams to climate change that will be implemented in your final plan? It seems like you're just focusing on one element and there's some huge gaps and chasms.
269	Jeff Durbin	I wanted to know if we're including with the new Folsom Dam being raised more capacity, does that being fit into the big picture on this?
300	Kendal Asuncion Los Angeles Area Chamber of Commerce	The Delta Conveyance Project also underpins the Governor's recently released draft Water Resilience Portfolio. We support strong leadership and modernization of the State Water Project and appreciate the government's -- governor's support for the project beginning with the environmental review process.
307	Brandon Dawson Sierra Club of California	Moreover, this alternative is more in alignment with a true water resilience portfolio, which would prioritize and put actions and projects that are environmentally beneficial for both California residents and its environment before considering projects such as this that would do nothing more than extinct Delta fish and wildlife as well as starve Delta communities of fresh water.

307	Brandon Dawson Sierra Club of California	Additionally, the State continuously argues that this project will not increase divergence from the Delta. While this project in a vacuum won't increase divergence, we urge you to look at this project holistically, considering both the state and federal proposals relating to operations of their respective systems. These proposals will increase divergence from an already fragile ecosystem, and the proposed project will facilitate proposed diversions. So unlike the proposed project, a no- tunnel alternative is more consistent with Delta Reform Act's policy of reduced reliance on the Delta as well as restoring the ecosystem of the Delta.
313	Mike Lynes Audubon California	Audubon California (Audubon) submits these comments regarding the Notice of Preparation (NOP) of Environmental Impact Report (EIR) for the Delta Conveyance Project ("Project") in the hope of ensuring that any efforts to address the significant challenges of the Sacramento-San Joaquin Delta ("Delta") derive from the best available science and comprehensive consideration of the project's impacts, mitigation measures, and uncertainties. The ecological value of the Delta cannot be overstated and a project of this size and complexity must proceed to carefully and fully assess environmental impacts and avoid, minimize, and mitigate for them to the fullest extent feasible.
316	Ronald Sullivan Eastern Municipal Water District	We understand Delta Conveyance is just one of many steps that need to be taken to ensure water resiliency in California, and EMWD and other agencies in Southern California have already invested heavily in development of local sustainable supplies, and continue to invest in such projects. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio including both imported and local supplies, and conservation. Despite the significant progress and investments being made on local projects and water use efficiency, the Delta conveyance project remains vitally important, for agencies like EMWD where the high quality, low salinity water supply is essential for the sustainability of local programs like water recycling. Every ton of salt imported in the water supply, must ultimately be removed and exported, which is resource and energy intensive.
326	Orion Camero	What we need to do is invest in regional water technologies and avoid the massive redirection and extraction of fragile rivers that are already on the precipice of destruction.
335	Jane Wagner-Tyack, League of Women Voters of San Joaquin County	With respect to the Delta, these policies align with principles established by the 2009 Delta Reform Act that are now part of the California Water Code and the Public Resources Code. Earlier iterations of the Delta Conveyance Plan3beginning with BDCP and WaterFix failed to meet the League's criteria for supporting new conveyance infrastructure of the Delta and to conform to established law.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
392	Katja Irvin	It's just important to discuss the relationship of the project to a lot of state regulations that are aiming to improve our environment and how the project will contribute to meeting the goals and requirements of those regulations.

404	Dr. Steven White	The system is collapsing. To stress it more is crazy, with due respect. The population growth in California is projected to grow to -- well, about 60 million by 2050. About 48 to 50 million by 2040. Clearly, we need to change the way we allocate water in order to have enough water for everyone. And that was -- that would involve a lot more than restructuring how efficiently we suck water out of the Bay and give it to agriculture in the summer. And so what we need to do is address water use patterns far beyond what we're doing here. And to make this project in the absence of addressing all those other problems is like putting a Band-Aid on a hemorrhage. It's just not going to work.
405	Jacklyn Shaw	(1) As part of a request for the Central Valley Flood Protection Board pull the consent item regarding the Army Corps starting its 408 process. Delta-related suggested solutions include: To stop flooding, we do need to restore funds for USACE Engineers to do Deep, PURE DREDGING, from Rio Vista towards Antioch Bay. If any tunnel, build it on the WEST SIDE of the Delta River! Construction costs more than Desalination. (A) San Francisco has a Desalination plant that needs to start operating every day. (B) They can allow Fresno and Tulare to use the Hetch Hetchy Reservoir and Friend Dam. Desalination Levee maintenance funding
413	Amanda Beck Friends of Clarksburg Services & Recreation	We're a nonprofit organization formed in Clarksburg to establish a regional recreation area for the North Delta. That's including a park and an aquatic center. My request and the board's request is that the impacts to the plan facility be addressed. The project expects to be built about the same time that the construction of this project could occur and then be operational during the period that you will still be in construction. Impacts addressed should include the noise impacts to people using that recreational facility, the traffic impacts to people trying to get here and use those facilities, air impacts such as hazardous air pollutants, and their impacts on the children and the sensitive folks that will be using those resources, sensitive populations, and then, of course, on the public services that are in this community.
420	Jeff Durbin	I believe that increasing conservation everywhere and everyone involved doing better water management, including better farming strategies, potential desalination projects, the increased capacity and storage potential coming from the raising of the Folsom Dam, and Shasta, those four projects could be enough. Projects in West Sacramento along the river where they did four cuts into the levee and moved them out wider to strengthen them and did more flow capacity when the river could swell. I spoke at the first meeting on February 3rd, a couple weeks ago about this -- for the single tunnel 6,000 cfm proposition with two large intakes. I agreed with many of the speakers and many Native American Indians and many other well-spoken individuals and group representatives that were concerned about the future problems the tunnel will pose to our rivers and streams, above and below the tunnel intakes proposed. I think that the conservation and other efforts could avoid the desecration of the Delta and other rivers and tributaries. I want you to use the best information available. I keep reading where it says "best available science." It's called the scientific method, which looks at all potentially available variables. I keep reading the DWR wants to use the best available science. I searched many of papers online for the words "scientific" to try to find scientific method and found only one to mention it, but nothing in the Delta Science Report.

425	Bill Martin	A second request I have for inclusion of future documents, in the Delta Reform Act of 2009, enshrined into law, the goal of reducing reliance on the Delta for water agency supplies. I simply don't understand how taking water out of the Sacramento River, water which will flow through the Delta if left alone to do so, reduces reliance on the Delta. The way to reduce reliance on the Delta is to reduce water transfers out of Delta, not increase them. Whichever preferred alternative is selected, the draft EIR needs to clearly state how this alternative will, in fact, reduce reliance on the Delta in accordance with state law.
434	Tom Slater	This EIR must consider the effects of operating the State Water Project in compliance with the 1981 contract between North Delta Water Agency and DWR. This contract is not discretionary. For instance, the salinity criteria of the 1981 contract is separate and distinct from decision 1641 standards and is year round. Therefore, the EIR should include DWR's nondiscretionary obligation to abide by the terms of the '81 contract and should analyze the impacts of the project operating in compliance with those terms.
435	Russel van Loben Sels	When you discuss the purpose and project -- the objectives of the project, you state that you will attempt to make them consistent with requirements of state and federal law. In your analysis of this project, it is imperative that you analyze the consistency of this project with all laws, promises, statutes, contracts, and other assurances -- dealing with State Water Project, Delta projects, and operations since the inception and in order for this project to be consistent with the Delta Reform Act of 2009, you need to clearly demonstrate that this project will not harm any Delta resources, including agriculture, and that it will result in reduced reliance on the Delta for your future water needs.
488	Frank Toriello We Advocate through Environmental Review (WATER)	I would also like to note that it's obvious that there's a larger scheme involving the sites reservoir and the raise on the Shasta Dam. CEQA specifically prohibits piecemealing, so these should be included in the EIR.
497	Byron Nelson, Jr. Hoopa Valley Tribe	The “Trinity System” is part of the Project Area, north of the Delta. Briefly, the significant issues of concern to the Tribe are centered on (1) protection of water reserved to the Trinity River by federal law and the 2000 Trinity River Fisheries Restoration Record of Decision (ROD); (2) protection of water quality, particularly temperature, of that reserved Trinity River water; and (3) protection of other water reserved to the Trinity River by the Trinity River Division Act of 1955.
497	Byron Nelson, Jr. Hoopa Valley Tribe	Recognize priorities for use of the TRD water downstream of Lewiston Dam.
497	Byron Nelson, Jr. Hoopa Valley Tribe	Avoid assuming that changes in the timing of TRD water exports to the CVP can be made.
497	Byron Nelson, Jr. Hoopa Valley Tribe	Model water deliveries in recognition of 1955 Act priorities for use of Trinity River Water.

501	Richard	There's a new project coming up. Some of you in Bethel Island know about it. Its's the Frank Tract Project. They're going to abandon Sherman Island as the mixing bowl. Salt water's invaded Sherman Island. Salt water's in Sherman Island. Jellyfish in Frank's -- in Sherman island. In fact, they live there. Seals, bottlenose dolphin in the river, we know about it. Seals are having babies in the river. Salt water. They're here. It's all tied in together. So look into all of this stuff because it's all going to impact it. They've made plans, factored in the dredging.
510	Dominic DeBellis	How does this project fit into development?
529	Robert Pyke	The second sentence of the co-equal goals description of the Delta Reform Act is "The co-equal goals could be achieve in a manner that protects and enhances the unique cultural, recreational, natural resource and agricultural values of the Delta as an evolving place".
539	Michael Brodsky Save the California Delta Alliance	The Notice of Preparation ("NOP") should be redrafted because it is not consistent with the Delta Reform Act, the Delta Plan, the Public Trust Doctrine, California Constitution Article X, section 2, the California Environmental Quality Act ("CEQA"), the legal uses to which the State Water Project ("SWP") may be put, environmental justice principles codified in Government Code section 65040.12, requirements to consider and avoid climate change impacts of new infrastructure and to consider mitigation of climate impacts through alternative uses of natural infrastructure codified in Public Resources Code section 71154, and other applicable laws.
553	Judith Kirk	Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
560	Bradford Pappalardo Steamboat Resort	The North Delta Water Agency contract restrictions and protections need to be addressed and upheld. The lack of actual operational criteria as a part of the EIR process is concerning and undermining this vital contract to uphold Delta agriculture. This EIR is incomplete if we are unable to evaluate final operational criteria impacts.
561	Diane Riddle State Water Resources Control Board	The Water Boards will have discretionary approvals over water right and water quality aspects of the Project and are responsible agencies for the Project pursuant to the California Environmental Quality Act (CEQA). As responsible agencies under CEQA, the Water Boards must review and consider the environmental effects of the Project identified in the EIR that are within their purview and reach their own conclusions on whether and how to approve the Project. (Cal. CodeRegs., tit. 14, § 15096, subd. (a).) Specifically, activities that may require approval by the Water Boards include changes to the SWP's and potentially the CVP's points of diversion of water and to other provisions of their water rights, water quality certifications pursuant to Clean Water Act section 401, National Pollutant Discharge Elimination System Permits (NPDES), and potentially other water quality approvals such as a Construction Storm Water General Permit, an Industrial Storm Water General Permit, Waste Discharge Requirements, and a Dewatering Permit.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Third, the purpose statement and objectives in the NOP are inconsistent with the co-equal goals for the Delta established in the Delta Reform Act. That Act establishes co-equal goals of providing a more reliable water supply and protecting, restoring and enhancing the Delta ecosystem in a manner that protects and enhances the unique values of the Delta. See Cal. Water Code § 85054. In contrast, the purpose and objectives in the NOP omits any consideration of ecosystem health and restoration, impacts to Delta communities. Such an approach is inconsistent with the Delta Reform Act, and the project purpose and objectives should be revised to incorporate restoration of the Bay-Delta ecosystem as a co-equal purpose to improving the physical reliability of the water delivery system.
571	Karen Jacques	The EIR should analyze consistency (or lack of consistency) with the 2009 Delta Reform Act's policy of placing less reliance on the Delta in meeting California's (water) needs.
576	Kelley Taber Sacramento County Water Agency	The EIR must evaluate the Project's consistency with all relevant Delta Plan policies, recommendations, and performance measures. Project impacts to the FRWP and Sacramento County residents' water supplies are inconsistent with specific Delta Plan policies and the coequal goals themselves. For example, the Project is not consistent with Delta Plan Policy DP P2 (Cal. Code Regs., tit. 23, § 5011), which requires that water management facilities be sited so as to avoid or reduce conflicts with existing uses, including the Hood wells and FRWP. The Project should be revised prior to release of the draft EIR to move the proposed intakes so that there is no potential for adverse effects to municipal wells or the FRWP. Any impacts to the availability or reliability of the Sacramento region's surface or groundwater resources must be acknowledged and avoided or fully mitigated.
602	Patrick Porgans Porgans & Associates	The DWR'S abysmal historical performance and track-record of failure to maintain and operate the California State Water Project (SWP) in accordance with applicable regional, state and federal rules and regulations, continues to place the lives, wellbeing, and public trust resources at an unacceptable level of risk. DWR officials claim that more than 27 million Californians rely on the State Water Project their water supply.6 That claim is dubious at best and misleading, as the SWP only provide about four (4) percent of the state's annual water needs! The current proposed one-tunnel project is but another version of a litany of revamped projects that have been morphed for the past 60 years. From DWR's initial failure to provide the necessary Delta Master Levees, its failed attempt in 1982 to obtain voter approval of the Peripheral Canal, the 1994 Bay Delta Accord (Voluntary agreement consummated behind closed doors), the 2009 BDCP, CALFED $6.5 billion debacle, Delta Vision, the failed dual conveyance canals, the California Water "Fix" (Delta twin tunnels), and the presently proposed one-tunnel Delta vision. The DWR's abysmal track-record raises the legitimate question as to what level of confidence the public can place in anything that DWR officials espouse. Where the potential to cause significant environmental impacts are identified, the EIR will identify avoidance, minimization, or mitigation measures that avoid or substantially lessen those impacts.

610	Henry Kuechler Reclamation District No. 2060	Any operational plan developed for the project must account for the legal requirements and protections that northern Delta Reclamation Districts within the boundaries of North Delta Water Agency (NDWA) and their landowners have under the 1981 NDWA contract with DWR for water quality protections and commitments.
612	Warren Bogle Reclamation District 150	Any operational plan developed for the project must account for the legal requirements and protections that northern Delta Reclamation Districts within the boundaries of North Delta Water Agency (NDWA) and their landowners have under the 1981 NDWA contract with DWR for water quality protections and commitments.
615	Justin Fredrickson California Farm Bureau	Incorporate direct input from, and consultation with the CVP and its contractors in its preparation of the EIR. If and when Reclamation initiates it's own NEPA process, this would include close state-federal coordination in that process. With or without participation—and contemplating the potential for either scenario—alternatives in the EIR should retain sufficient system-level operational capacity and flexibility to accommodate possible additional or alternative conveyance-related projects and improvements by Reclamation and its contractors. This might include possible Through-Delta improvements or adjustments to existing CVP operations, local projects, or above-ground and underground storage projects both north and south of the Delta. Similarly, while eventual water rights proceedings would necessarily address this topic more directly, the EIR should further consider and, to the extent possible, address potential indirect impacts of dual conveyance SWP operations
615	Justin Fredrickson California Farm Bureau	From a policy standpoint, grounding influences like a global voluntary agreement solution and state-federal cooperation around state and federal operational criteria could greatly help the current uncertain state of play, as would a measure of operational flexibility, some additional groundwater recharge capacity, and a level of greater water supply reliability across different year types. This too likely exceeds the minimal legal requirements of an EIR per se and, rather, speaks to the quality of the EIR's analysis and to the underlying objectives of the proposed project itself; even so, such relevant policy and planning context may be precisely the big-picture perspective required, not only for an successful Delta conveyance solution, but also for a resilient and durable water future more generally.

615	Justin Fredrickson California Farm Bureau	There are many on-going conservation activities that should be considered as part of the larger context and environmental setting for the proposed project. This would include required habitat restoration actions under the USFWS and NMFS CVP and SWP biological opinions, the Delta Smelt Resiliency Strategy, the Sacramento Valley Salmon Resiliency Strategy and, potentially, certain proposed water acquisition, habitat restoration, fish passage, conservation hatchery, and scientific research activities under proposed Bay-Delta Voluntary Agreements. Additionally, the proposed Sites Reservoir Project, which has been awarded some $820 in from Proposition 1, would develop an average of up to 250 thousand acre feet in new dedicated state-controlled environmental water assets, while simultaneously affording additional environmental protection beyond this through related system reoperation. Many such actions can be implemented through regional partnerships, in compatible ways with existing agricultural uses of the land, or can be otherwise sited to avoid major impacts on local agricultural economies. While these actions are not part of the proposed action as described, they may be viewed as linked actions that can help to move our statewide water system in the direction of the 2009 Delta Reform Act's 'co-equal goals' of water supply and ecosystem health. To the extent the proposed project is motivated by a desire to address the water supply impact of current regulations on SWP and CVP projects operations from an operational and engineering standpoint, such on-going conservation activities represent an important complement, in terms of their ability to potentially improve ecosystem conditions and recover protected native fish populations. Proactive environmental enhancement actions of the kind described can move beyond single-variable management to more efficiently achieve improved biological outcomes at lower water costs. Habitat improvements and alternative migration corridors can increase fish populations and remove fish from harm's way, while dedicated environmental water assets can help to address possible detrimental effects of dams and pumps and enhance operational flexibility. For all of these reasons, such green infrastructure projects should be viewed as part of an integrated strategy to achieve a more resilient statewide water system and considered in the EIR as such.
616	Larry Gardiner Brannan-Andrus Levee Maintenance District	The District is within the boundaries of North Delta Water Agency (NDWA) and its landowners have subcontracts under the 1981 NDWA contract with DWR for water quality protections and commitments from the State. BALMD has concerns that the frequency of salinity intrusion events will increase under the Delta Conveyance project. The legal obligations of the 1981 contract are integral to any future implementation of the Delta Conveyance Project, and any operational plan developed by DWR must account for them.
627	Nichelle Garcia	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta as a water source.

629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	With lengthy and costly construction logistics, have California's key water agencies, including DWR, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs and widely shared those with the public? Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam and construction of projects planned during the planning period for the Delta Conveyance Project?
662	John McManus Golden Gate Salmon Association	Second, in order to be consistent with the Delta Reform Act the DEIR must consider one or more alternatives that include new conveyance as part of a portfolio of local and regional water supply investments. The CALFED EIR/EIS provides a potential model for analyzing Delta conveyance as part of a broader program; that final EIR analyzed the effects of the CALFED program, including program elements such as habitat restoration, water conservation, new Delta conveyance, water quality improvements, and improved flows and fish screens to protect fish and wildlife. Similarly, here CEQA analysis of a single tunnel Delta conveyance project as part of a portfolio that reduces reliance on the Delta and invests in local and regional water supply projects could utilize both programmatic and project level analysis of different program elements.
664	Roberto Valdez	The DCP needs to coordinate environmental efforts to protect both targeted & associates species identified by Northern California Conservation Plan Partners, i.e., HCPs or NCCPS, in surrounding counties that the single tunnel will impact along designated waterways from Freeport to Sutter Slough.
675	Terrie Mitchell Sacramento Regional County Sanitation District	Impacts to Regional San's diversion operations are driven by hourly river flow rates at Freeport. Based on evidence submitted by Regional San and available to DWR in connection with the WaterFix, it is reasonable to assume that Delta Conveyance Project operations will alter the conditions of the Sacramento River at Freeport, such that Regional San will need to divert effluent to emergency storage basins for longer durations and in larger quantities than under existing conditions. Essentially, every time the Delta Conveyance Project causes river conditions that necessitate a diversion greater than would occur in the baseline condition, Regional San will be forced to commit its facilities to correcting conditions created by the Project in order to meet its NPDES permit obligations, thereby reducing Regional San's operational flexibility and creating unknown risks to Regional San's operations. By consuming emergency storage basin capacity that otherwise would be available for SRWTP operations, the Delta Conveyance Project has the potential to result in significant environmental impacts by necessitating construction of additional storage facilities. The Delta Reform Act requires that a new Delta conveyance project fully mitigate impacts. Therefore, the EIR must not only evaluate and disclose these impacts, but it must also identify the measures that commit DWR to fully mitigate these impacts.

675	Terrie Mitchell Sacramento Regional County Sanitation District	Regional San has worked with the Delta Stewardship Council since 2009 in the development of the Delta Plan, Delta Science Plan, and Delta Science Program and Delta Independent Science Board work products. Regional San is very committed to the health of the Delta ecosystem and has invested substantial resources to help produce a Delta Plan that serves the coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. Project impacts to Regional San's treatment facilities and operations, described above, would present a substantial obstacle to Regional San's ongoing efforts to further the coequal goals and are inconsistent with specific Delta Plan policies and the coequal goals themselves. Specifically, DWR's decision to locate the Delta Conveyance Project diversion structures directly downstream of the SRWTP is not consistent with Delta Plan Policy DP P2 (Cal. Code Regs., tit. 23, §5011), which requires that water management facilities be sited so as to avoid or reduce conflicts with existing uses. The potential for increased regulatory requirements and substantial physical modifications to Regional San's facilities and operations create direct conflicts with the existing SRWTP use, and thus the Delta Conveyance Project as described in the NOP is inconsistent with DP P2. The Delta Conveyance Project should be revised prior to release of the draft EIR to move the proposed intakes so that there is no potential for adverse effects to the SWRTP.
682	Gail Lorimer	Seems this policy below conflicts with all this group has been attempting to do. See 'RESPECT LOCAL LAND and USE' ……. DP P2. Respect Local Land Use When Siting Water or Flood Facilities or Restoring Habitats (a) Water management facilities, ecosystem restoration, and flood management infrastructure must be sited to avoid or reduce conflicts with existing uses or those uses described or depicted in city and county general plans for their jurisdictions or spheres of influence when feasible, considering comments from local agencies and the Delta Protection Commission. Plans for ecosystem restoration must consider sites on existing public lands, when feasible and consistent with a project's purpose, before privately owned sites are purchased. Measures to mitigate conflicts with adjacent uses may include, but are not limited to, buffers to prevent adverse effects on adjacent farmland.
683	Jeff McCormack Reclamation District 1002	Second, the proposed activities of the DCA are contrary to the Delta Stewardship Council's Co-Equal Goals of water conveyance and environmental with Agriculture, and related residential use. Agriculture relies on transportation infrastructure to get food as a national security resource to markets nationwide, and internationally.
684	Jeff McCormack John McCormack Co.	We are also concerned about the potential for diversion of Subvention Program funds that we rely on to maintain levees, as members of the reclamation district. We pay assessments toward maintaining those levees, and your facilities would benefit from the protection afforded by those levees. Yet the funding is always at risk of being cut, even in years as flush as this, when the State is running a $24 Billion surplus. Our fees should be reduced, to reflect the increased difficulty and costs incurred as the result of interference with our pre-existing operations.

698	Steve Lambert Butte County Board of Supervisors	Most of the beneficiaries of the DCP are in basins subject to SGMA and the policy of regional self-reliance. The BDCP/WaterFix ignored the cumulative impacts from implementation of SGMA by various groundwater sustainability agencies without any documentation or data. The DCP must account for SGMA and avoid redirecting impacts to the northern Sacramento Valley.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	The recent Biological Opinion prepared for the Reinitiation of Consultation on the Coordinated Long-Term Operation of the Central Valley Project and State Water Project did not address Trinity River salmonids. It should have. As revealed by Kamman Hydrology's review of DWR's modeling of Trinity Reservoir storage (attached as Exhibit 1, supplied by the commenter, which is a review of model results for Alternative 1 of the EIS for the Reinitiation of Consultation on the Coordinated Long-Term Operation of the Central Valley Project and State Water Project), the Trinity Reservoir storage calculations for DWR' s Preferred Alternative 1 are deeply flawed. They overstate Trinity Reservoir Storage by up to 350,000 AF during a critically dry period, with the result that the Project's operations will have far greater impacts on the Trinity River System than DWR projects. This shortfall in water supplies will have very significant consequences for the Trinity River and its fish and wildlife. Thus, under the current operational scheme it is likely that coordinated SWP and CVP operations will lead to frequent violation of condition 7.b of the 2000 Trinity NMFS BO. The DEIR must address this impact, and explore alternatives that would avoid or at least mitigate it. The DEIR should also examine the impacts on the Trinity River System from reoperation of the Trinity Reservoir. The Bureau of Reclamation's "Central Valley Project Power fuitiative"2 implies that powerplant bypass operations at CVP dams, including Trinity Dam, will no longer be implemented to protect fisheries resources. While bypassing the Trinity Dam Powerplant during periods of low reservoir storage is currently required to maintain suitable temperatures for downstream fisheries under Term and Condition 7.a of the 2000 Trinity NMFS BO, the Bureau of Reclamation's apparent intent to ignore this requirement would, tragically, be in keeping with the current federal administration policies disregarding species protections.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	The DEIR should also examine the impacts on the Trinity River System from reoperation of the Trinity Reservoir. The Bureau of Reclamation's "Central Valley Project Power fuitiative"2 implies that powerplant bypass operations at CVP dams, including Trinity Dam, will no longer be implemented to protect fisheries resources. While bypassing the Trinity Dam Powerplant during periods of low reservoir storage is currently required to maintain suitable temperatures for downstream fisheries under Term and Condition 7.a of the 2000 Trinity NMFS BO, the Bureau of Reclamation's apparent intent to ignore this requirement would, tragically, be in keeping with the current federal administration policies disregarding species protections.

701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	Alternatively, DWR must commit to a Trinity River specific water right hearing by the State Water Resources Control Board to incorporate additional protections for the Trinity River, including: Conformance with the instream fishery flows set forth in the Trinity River Record of Decision as minimum instream flows. Provision for release of not less than Humboldt County's 50,000 AF contract water in addition to fishery flows and tribal ceremonial flows. Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River. A requirement for a minimum cold water storage in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during a multi-year drought. Based on studies to date, 1.25 million AF to 1.75 million AF is appropriate for starting storage, with storage levels not falling below 900,000 AF in any year. Require Reclamation to address the temperature issue in Lewiston Reservoir through a feasibility study and NEPA document to follow up on the 2012 preliminary technical memorandum by Reclamation. When releases from Spring Creek are more than one degree Fahrenheit warmer than releases from Shasta Dam, limit the export of Trinity River water to the Sacramento River to the quantity necessary to meet Trinity River Basin Plan Temperature Objectives.

701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	In preparing the DEIR, and designing the Project and alternatives thereto, DWR must consider the requirements of the Delta Reform Act and the Delta Plan. DWR must ensure that the Project is consistent with their mandates. Before DWR can approve the Project and move forward with its construction, it must provide the Delta Stewardship Council with its consistency determination and comply with any orders from the Delta Stewardship Council regarding the same. DWR must show compliance and consistency with these goals. In particular, DWR must show that it can comply with the following goals and polices of the Delta Plan: Best Available Science (22 CCR§ 5002(b)(3),) Reduce Reliance on the Delta Through Improved Regional Water Self Reliance (23 C.C.R. § 5003), Delta Flow Objectives (23 C.C.R. § 5005), and Respect Local Land Use When Siting Water or Flood Facilities or Restoration Habitats (23 C.C.R. § 5011). In response to the Delta Stewardship Council's request, DWR was unable to provide the Delta Stewardship Council with evidence supporting DWR's prior determination of consistency with these Delta Plan policies. For example, DWR must show that it has relied upon the best available science in its analysis and decision making. Delta Plan GP 1(b)(3) (22 CCR § 5002(b)(3)): Best Available Science. In its analysis and approval of the WaterFix, DWR improperly failed to address credible scientific evidence of sea level rise at levels sufficient to render the Project unusable long before the Project' s 100-year life would end. In undertaking its analysis in the DEIR, DWR must present more comprehensive sea level rise analysis over a range of likely scenarios, including high-risk scenarios - and this analysis must address both the physical impacts of this sea level rise and the resulting salt water intrusion, as discussed above. DWR must show that the SWP contractors and CVP contractors that would receive water from the Project have reduced their reliance upon the Delta and are instead increasing reliance upon local water supplies. As of DWR's prior consistency determination, DWR's records reflected that Alameda County Flood Control & Water Conservation District, Zone 7, Santa Clara Valley Water District, Coachella Valley Water District and the Metropolitan Water District ("Met") all forecast increases in SWP water due to new Delta conveyance. DWR's August 2018 Consistency Determination: Reduced Reliance Analysis 3-40 (Table WR P1-1). DWR must be able to demonstrate that each water supplier will comply with WR P1-1's mandates regarding reduced reliance on the Delta. DWR must also be able to demonstrate historical compliance with Delta flow objectives established by the State Water Resources Control Board, and show that the Project will not increase the likelihood that water quality violations will occur.
702	Frank Toriello We Advocate Through Environmental Review	The EIR must also study and incorporate programs to protect and support superior water quality and optimize water quantity that flows from these Water Recharge Areas.
705	Roger Mammon	How does DCP comply with the 2019 Delta Reform Act which mandated that there be less reliance on the Delta for water?

708	David Mooney Bureau of Reclamation	With the Delta Conveyance Project in place, it is important that Reclamation continue to meet our obligations under the Central Valley Project Improvement Act (CVPIA), including deliveries to wetland habitat areas ("Refuges") under Section 3406(d) of the CVPIA, and protect existing water rights and contractual priorities. Operation of the Delta Conveyance Project must not negatively impact Reclamation's ability to meet existing legal obligations.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	The California Legislature passed the North Delta Agency Act (Cal Statutes 1973 Chapter283), the South Delta Water Agency Act (Cal Statutes 1973 Chapter 1089), and the Central Delta Water Agency Act (Cal Statutes 1973 Chapter 1133) which created the three Delta Water Agencies as political subdivisions of the State of California. Each Delta Water Agency is charged with negotiating, entering into, administering, and enforcing agreements with the United States and the State of California: 1) To protect the water supply of the lands within the Agency against intrusion of ocean salinity, and 2) To assure the lands within the Agency have a dependable supply of water of suitable quality sufficient to meet present and future needs. The South Delta Water Agency encompasses about 148,000 acres, the Central Delta Water Agency encompasses about 120,000 acres, and the North Delta Water Agency encompasses about 277,000 acres primarily devoted to agriculture. The North Delta Water Agency also has a binding Water Right Settlement Agreement with DWR representing the State of California in 1981 that establishes year-round protection standards. Unfortunately, the State has failed to comply with the 1981 contract with the North Delta Water Agency on numerous occasions and have not been held accountable. All three agencies have been given protections within California law under the Area of Origin and Delta Protection Act, but the State regularly fails to ensure those protections. All three agencies have submitted numerous comments of concerns and have filed lawsuits against California for actions that have or will cause damage to the water quality and supply that is held in right by Delta land. The state needs to stop wasting money on developing projects that they know will cause harm to water quality and/or supply available to Delta right holders and instead look at the alternative water projects that will not involve the Delta but will provide water sustainability for all of California. We request that the EIR include the alternative projects listed in the second part of our letter.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Sacramento-San Joaquin Delta Reform Act of 2009. Delta Policy (chapter 2, 85020) outlines the policy for the State of California to achieve the coequal goals for management of the Delta. The state has failed to make progress on most of these policies. These include salinity and water quality issues, lack of investment in flood protection, expansion of statewide water storage, and statewide water conservation and sustainability. The biggest policy failure has been the lack of progress to reduce the reliance on the Delta in meeting California's future water supply needs (85021). DWR has a poor history of building and maintaining their current infrastructure. They have wasted time and money on numerous versions of this project instead of focusing on other economical and sustainable water solutions. We request that the EIR include how this project reduces California's water reliance on the Delta.

714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The EIR must analyze the Delta tunnel's consistency with the Delta Reform Act to reduce reliance on the Delta as a water source.
715	Daniel Wilson Reclamation District 3	Any operational plan developed for the project must account for the legal requirements and protections that northern Delta Reclamation Districts within the boundaries of North Delta Water Agency (NDWA) and their landowners have under the 1981 NDWA contract with DWR for water quality protections and commitments.
717	David Ledger Shasta Environmental Alliance	All possible uses of executive orders by the President of the United States that would be detrimental to the citizens of California and the environment should be considered in all options proposed for the project especially if the federal government should become a joint partner. If a joint federal – state project should go forward, this could lead to increased control by the federal government. The loss of California control over amounts of Sacramento River water diverted, both federal and state, and weaker environmental protections imposed by the federal government should be addressed in the EIR.
718	David Strecker San Joaquin Farm Bureau Federation	The California Legislature passed the North Delta Agency Act (Cal Statutes 1973 Chapter283), the South Delta Water Agency Act (Cal Statutes 1973 Chapter 1089), and the Central Delta Water Agency Act (Cal Statutes 1973 Chapter 1133) which created the three Delta Water Agencies as political subdivisions of the State of California. Each Delta Water Agency is charged with negotiating, entering into, administering, and enforcing agreements with the United States and the State of California: 1) To protect the water supply of the lands within the Agency against intrusion of ocean salinity, and 2) To assure the lands within the Agency have a dependable supply of water of suitable quality sufficient to meet present and future needs. The South Delta Water Agency encompasses about 148,000 acres, the Central Delta Water Agency encompasses about 120,000 acres, and the North Delta Water Agency encompasses about 277,000 acres primarily devoted to agriculture. The North Delta Water Agency also has a binding Water Right Settlement Agreement with DWR representing the State of California in 1981 that establishes year-round protection standards. Unfortunately, the State has failed to comply with the 1981 contract with the North Delta Water Agency on numerous occasions and have not been held accountable. All three agencies have been given protections within California law under the Area of Origin and Delta Protection Act, but the State regularly fails to ensure those protections. All three agencies have submitted numerous comments of concerns and have filed lawsuits against California for actions that have or will cause damage to the water quality and supply that is held in right by Delta land. The state needs to stop wasting money on developing projects that they know will cause harm to water quality and/or supply available to Delta right holders and instead look at the alternative water projects that will not involve the Delta but will provide water sustainability for all of California. We request that the EIR include the alternative projects listed in the second part of our letter.

718	David Strecker San Joaquin Farm Bureau Federation	Sacramento-San Joaquin Delta Reform Act of 2009. Delta Policy (chapter 2, 85020) outlines the policy for the State of California to achieve the coequal goals for management of the Delta. The state has failed to make progress on most of these policies. These include salinity and water quality issues, lack of investment in flood protection, expansion of statewide water storage, and statewide water conservation and sustainability. The biggest policy failure has been the lack of progress to reduce the reliance on the Delta in meeting California's future water supply needs (85021). DWR has a poor history of building and maintaining their current infrastructure. They have wasted time and money on numerous versions of this project instead of focusing on other economical and sustainable water solutions. We request that the EIR include how this project reduces California's water reliance on the Delta.
724	Harvey Correia Reclamation District 2067	Any operational plan developed for the project must account for the legal requirements and protections that RD 2067 and its landowners have by being within the boundaries of North Delta Water Agency (NDWA) and under the 1981 NDWA contract with DWR for water quality protections and commitments.
730	Reclamation District 551	The District is within the boundaries of the North Delta Water Agency, and its landowners hold subcontracts under the 1981 North Delta Water Agency Contract with DWR. Those protections include not only water quality protections, but a commitment by the State that it will not convey SWP water in such a way as to cause "a decrease or increase in the natural flow direction, or cause the water surface election in Delta channels to be altered, to the detriment of the Delta channels or water users" within the NDWA area. In the event that "lands, levees, embankments or revetments…experience seepage or erosion damage," the State is responsible for repairing and alleviating that damage. (1981 Contract, para. 6). These legal obligations are an integral part of any future implementation of the Delta Conveyance Project, and any operational plan developed by DWR must account for these legal requirements.
735	Regina Cuellar Shingle Springs Band of Miwok Indians	Federal reclamation law establishes a first priority for use of the CVP water developed by the Trinity River Division (TRD) for restoration, preservation and propagation of Trinity River fish and wildlife, and economic development of the Hoopa Valley Tribe and other tribes of the Klamath Basin. Any alternatives considered for long-term operation with the CVP must consider ways to fully implement the mitigation, restoration, preservation, and propagation of fish and wildlife and tribes' economic development as mandated by Congress and required by the United States' and the State's obligations.
736	Kelley Taber County of Sacramento	DWR's recycling of this ill-conceived north-Delta diversion separate from and in advance of any other specific projects to reduce south of Delta exporters' reliance on the Delta, is inconsistent with the Delta Reform Act's "coequal goals" of "providing a reliable water supply for the State while restoring the Delta's ecosystem," the Delta Plan, and Delta-specific policies and principles adopted by the Sacramento County Board of Supervisors.

736	Kelley Taber County of Sacramento	DWR also should consider the information in the County's Appeal to the Delta Stewardship Council (DSC) of DWR's Certification of Consistency with Delta Plan for California WaterFix (August 27, 2018), and the County's supplemental responses to the DSC and DWR related to the appeal, all of which were previously made available to DWR, and are incorporated herein by reference. Finally, DWR also should consider the evidence submitted by the County in the WaterFix water rights change petition hearing before the State Water Resources Control Board (SWRCB). All of this information was previously provided to DWR, is available to DWR through June 30, 2020 on the SWRCB website at https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/exhibits/saco.html, and is incorporated herein by reference.
736	Kelley Taber County of Sacramento	The County's significant local concerns include: Uncertainty for long-term water right holders upstream of the Delta.
740	Ryan Hernandez Contra Costa County Water Agency	The proposed project may also affect Byron Airport's Habitat Management Lands and lands that are part of the East Contra Costa County Habitat Conservancy's Preserve System. These lands are conserved for the conservation of habitat for State and Federal special status species. The EIR should address the need to prevent permanent and temporary impacts to these lands.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Alternatives Reducing Reliance on the Delta are Required by the Delta Reform Act The Sacramento-San Joaquin Delta Reform Act of 2009 (Delta Reform Act) establishes the policy of the State of California "to reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency." (Water Code § 85021.) The Act establishes co-equal goals "of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem," (Water Code § 85054) and expressly requires that a new conveyance process (previously called the BDCP) evaluate "[a] reasonable range of Delta conveyance alternatives, including through-Delta," as well as new dual or isolated conveyance alternatives. (Water Code § 85320(b)(2)(B.) The Tunnel Project is antithetical to these provisions of the Delta Reform Act. Its purpose would be to divert enormous quantities of freshwater flows out of and away from the Sacramento River and Delta. The Project would do the opposite of reducing reliance on the Delta as required by the Delta Reform Act. The massive Project and expenditures would instead increase reliance on the Delta. DWR must comply with law by including alternatives in the Draft EIR that would reduce reliance on the Delta and include through-Delta, not just tunnel "alternatives," as required by the Delta Reform Act.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Public Trust Doctrine Analysis Will be of Critical Importance in Doing the Quantification Work Required by the Delta Reform Act and the Alternatives Analysis Required by CEQA The California Supreme Court has held that under California's public trust doctrine, "[t]he state has an affirmative duty to take the public trust into account in the planning and allocation of water resources." (National Audubon Society v. Superior Court (1983) 33 Cal.3d 419, 446). The Delta Reform Act incorporates this principle as it mandates, "[t]he longstanding constitutional principle of reasonable use and the public trust doctrine shall be the foundation of state water management policy and are particularly important and applicable to the Delta." (Water Code § 85023.) In accordance with this, DWR must consider the public trust doctrine during all stages of the proposed project, especially when assessing the quantity of water that will be allocated to flow through the Project. But the NOP fails to mention the public trust doctrine altogether, even though the doctrine is crucial in understanding the state's water supply availability.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The Governor's April 2019 Executive Order N-10-19 called for the water resilience portfolio and required state agencies to "embrace innovation and new technologies" and "incorporate successful approaches from other parts of the world." Implementing such modern water measures would reduce the claimed need for the Project, and thus improve water quality in California's rivers and the Delta.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	So to fully comply with CEQA, the Delta Reform Act, and the Governor's Executive Order, the Draft EIR must disclose and analyze all significant upstream and downstream impacts as well as all cumulative impacts and growth inducing impacts of the Project. To do so requires adequate quantification.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	This Draft EIR Process Must be Integrated with DWR's Other Related Processes CEQA requires that the EIR project description include "A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies." (Guidelines § 15124(d)(1)(C)). The second sentence in that subsection goes on to require, "To the fullest extent possible, the lead agency should integrate CEQA review with these related environmental review and consultation requirements." With one hand, DWR is proceeding to prepare a Draft EIR on the Tunnel Project. With another hand, DWR released its Draft EIR for Long-Term Operation of the SWP on November 21, 2019. DWR closed the public review period on that Draft EIR on January 6, 2020. Though the SWP is the stated reason for the Tunnel Project, the SWP Draft EIR failed to even mention or disclose, let alone analyze, the addition and inclusion of the Tunnel Project. Moreover, through the Delta Conveyance Design and Construction Authority process DWR and the State Water Contractors have already been designing the Proposed project in the absence of any CEQA compliance whatsoever. And with an extra hand, DWR is already negotiating cost allocations with the water exporters for the Project. To proceed in the manner required by CEQA, DWR must prepare a new Draft EIR on the SWP Long-Term operation including environmental analysis of the Project, and recirculate it for public review and comment. An accurate water availability and needs analysis, quantification, and disclosure and analysis of the Project and its causal relationship with SWP Long-Term operations must be central focuses of the new Draft EIR. And this analysis should have been conducted prior to the commencement of any design processes or negotiations for cost allocations.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	DWR Must Not Segment Environmental Analysis CEQA Guidelines § 15378(a), in relevant part, states: "'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment…." (Emphasis added.) Guideline § 15378(c) adds that "[t]he term 'project' refers to the activity which is being approved and which may be subject to several discretionary approvals by government agencies. The term 'project' does not mean each separate governmental approval." The court in Burbank-Glendale-Pasadena Airport Authority v. Hensler noted CEQA's broad definition of "project" avoids potential piecemealing or segmentation of environmental analysis the definition, ensuring "that environmental considerations not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." (233 Cal.App.3d 577, 592 (1991)). As such, a lead agency must not piecemeal the analysis of several smaller projects that are part of a larger project. Unfortunately, DWR's actions relating to the Tunnel Project are contrary to this legal obligation. DWR and others are designing the construction and operations of the Project in the absence of any CEQA compliance whatsoever, and negotiating an agreement in principle for the specific project without the project ever being approved or evaluated. The Draft EIR on Long-Term SWP operations conceals rather than analyzes the Project and those ongoing DWR activities. In separate processes during the same timeframe, DWR seeks to conduct the environmental analysis of SWP Long-Term operation as well as the environmental analysis of the Tunnel Project which is intended "to restore and protect the reliability of State Water Project (SWP) water deliveries…." (NOP 2). Instead of dealing with the whole of the action as required by CEQA, these processes are all being done separately and segmented from each other. DWR is failing to proceed in the manner required by CEQA.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Increasing water recycling and efficiency is enshrined in state law: SB 606 and AB 1660, enacted in 2018, emphasize efficiency and stretching existing water supplies in our cities and on farms. Moreover, "[m]any Southern California water districts are building regional self-sufficiency but do not expect to be able to feasibly replace all water supply diverted from the Delta over the next couple of decades. (Draft Portfolio 113)(Emphasis added). The Draft Portfolio embraces this approach and notes that diversifying water supply resources "has helped many communities effectively weather drought." (Draft Portfolio 12). "The most cost-effective, environmentally beneficial way to stretch water supplies is through better water use efficiency and eliminating water waste….Recycled water is a sustainable, nearly drought-proof supply when used efficiently, and the total volume of water California recycles today could triple in the next decade." (Draft Portfolio 17.)

747	Jan McCleery Save the California Delta Alliance	During the SWRCB Permit Hearings, after listening to the substantive concerns, the SWRCB did not feel comfortable with issuing a permit until the Delta Stewardship Council (DSC) approved the WaterFix Project as "consistent" with the Delta Plan – a requirement for any project affecting the Delta. The DSC held a serious of Consistency Hearings where the evidence was once again presented. Staff found "The Department [DWR] fails to demonstrate substantial evidence in the record to support its findings that the project is consistent with respect to compatibility with local land use plans, conflicts with land uses in existing Delta communities, conflicts with existing land uses due to impacts on cultural and historical resources, conflicts with existing Delta parks and recreation uses, traffic impacts, and conflicts with existing land uses due to noise impacts." At the end of 2018, the WaterFix plan was remanded back to the Department of Water Resources (DWR) to resolve the issues.
747	Jan McCleery Save the California Delta Alliance	I am surprised that the first step the DCA took was not to review the testimonies from the SWRCB Permit Hearings and from the DSC Consistency Hearings that caused the DSC Staff to say the WaterFix was inconsistent with the Delta Plan and therefore could not go forward. That review should have included studying the Save the California Delta Alliance testimonies (those were prefaced by "SCDA" when uploaded to the SWRCB website and the organization was referred to as "The Alliance" in testimonies provided) concerning: 1. Noise pollution and other impacts on Legacy Towns in the North 2. Recreation impacts 3. Transportation expert evaluation of Highway 4 Gridlock
747	Jan McCleery Save the California Delta Alliance	SEC member Karen Mann read this statement at a prior SEC meeting about the impact on the towns in the north: "It is clear that the intakes cannot be placed in any of the locations shown on the preliminary drawings for discussion purposes (that is in 2 of the 3 locations of previous intakes 2, 3, and 5 of California WaterFix). Extensive evidentiary showings in the prior State Water Resources Control Board hearings and Delta Stewardship Council hearings show that neither of these agencies can approve intakes in these locations because it would not be consistent with the Public Trust Doctrine (Water Board) or the Delta Reform Act (Delta Stewardship Council). It is unacceptable to locate the intakes in close proximity to Delta Legacy communities. We understand that DWR wants to put the intakes in these locations only because they claim they have an existing water right at these locations. DWR will just have to accept the reality that they are going to have to put the intakes somewhere else and initiate a new water right in order to do so.
747	Jan McCleery Save the California Delta Alliance	The longer-term issues raised at the SWRCB Permit Hearings and DSC Consistency Hearings need to be addressed with a single tunnel. The DSC staff accepted one of STCDA's main arguments: that WaterFix is not consistent with D-1641 water quality requirements (meaning acceptable salinity in the Delta, particularly that it violates the Export to Inflow ratios). I do not see how a single tunnel will significantly reduce that issue since the goal is to maintain current export levels.

750	David Guy Northern California Water Association	To adequately inform the public and decision-makers about the environmental impacts of the proposed project, the draft EIR should provide sufficient information about operations to demonstrate that the proposed project will not impact water rights or contracts, and will not reduce available water supplies, both surface and groundwater, for the economy and environment in the Sacramento River Basin.
752	Amber McDowell Double M Farms	Sacramento-San Joaquin Delta Reform Act of 2009. Delta Policy (chapter 2, 85020) outlines the policy for the State of California to achieve the coequal goals for management of the Delta. The state has failed to make progress on many of these policies. These include the lack of investment in flood protection, expansion of statewide water storage, and statewide water conservation and sustainability, and salinity and water quality issues. The biggest policy failure has been the lack of progress to reduce reliance on the Delta in meeting California's future water supply needs (85021). I request that the EIR include several of the alternative proposed projects out there that would reduce water reliance on the Delta and assist with CA's need for water sustainability.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The EO is important to analyze as, 1) it does not authorize the initiation of the Delta Conveyance Project or an EIR, 2) it identifies the objectives for any project under the Water Resiliency Portfolio (most of which the Delta Conveyance Project does not include), and, 3) it provides a set of requirements that must be utilized as screening criteria for the evaluation of any project alternative or alternative component that is part of the EO Water Resiliency Portfolio, i.e. must be applied to the Delta Conveyance Project alternatives screening and development.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The Delta Conveyance Proposed Project Does Not Accomplish the Required Objectives of the EO. The following bullet points are objectives and issues to be addressed by projects in the Water Resiliency Portfolio required by the EO that are not fulfilled by the proposed Delta Conveyance Project. Unsafe drinking water Major flood risks that threaten public safety Depleted groundwater aquifers Uncertain agriculture water supplies Native fish population threatened with extinction Health of our environment Provide clean, dependable water supplies to communities, agriculture, and industry while restoring and maintaining the health of our watersheds

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The assumption of shorter peak flow wet season hydrology in the future dictates that any project must anticipate this flow regime and incorporate design, engineering and operations consistent with this future hydrology. The implication is that the SWP must adapt to capture these wet season peak flows and anticipate significantly reduced operations in non-peak flow periods. Previously in other water diversion projects, this hydrology and operation has been referred to as a "Sip vs. Gulp" diversion operation. "Gulp" during peak flows when environmental impacts are reduced and "sip" or abstain from diversion operations during reduced and low flows when environmental impacts are much greater. Sip and Gulp SWP water diversion operation strategy requires downstream of delta water storage to store peak flow diverted water for use during periods of low or no diversion operations. The Delta Conveyance Proposed Project has no feature which allows or facilitates improved capture or storage of these wet period peak flows and fails to propose any operations to address changed future hydrologic patterns. Contradictory to the EO required assumption, the Delta Conveyance Project assumes increased operations in non-peak flow conditions by moving the SWP intakes to a new upstream location.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	EO Water Resilience Portfolio Requirements: "IT IS HEREBY ORDERED THAT:" 2. "Agencies shall first inventory and assess:" (emphasis added) f. "Current planning to modernize conveyance through the Bay Delta with a new single tunnel project." 3. "This water resilience portfolio established by these agencies shall embody the following principles: (emphasis added) a. Prioritize multi-benefit approaches that meet multiple needs at once. b. Utilize natural infrastructure such as forests and floodplains. c. Embrace innovation and new technologies. d. Encourage regional approaches among water users sharing watersheds. e. Incorporate successful approaches from other parts of the world." 2 and 2f above orders an inventory and assessment of current planning for modernizing conveyance through the Bay Delta with a single tunnel project. This order clearly does not authorize initiation of a project to plan or propose a Delta Conveyance project; it orders an inventory and assessment which is a report, not a CEQA project. the Delta Conveyance Project has no legal basis for initiation. Without the legal basis for project initiation, any funds allocated to or expended by the Delta Conveyance Project are by definition "unauthorized" and illegal. The EO is also clear that the inventory and assessment must be done first which means it must occur before any project that might result from this inventory and assessment can be initiated regardless of other orders, policies or actions.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	EO Water Resilience Portfolio Requirements: "IT IS HEREBY ORDERED THAT:" 2. "Agencies shall first inventory and assess:" (emphasis added) f. "Current planning to modernize conveyance through the Bay Delta with a new single tunnel project." 3. "This water resilience portfolio established by these agencies shall embody the following principles: (emphasis added) a. Prioritize multi-benefit approaches that meet multiple needs at once. b. Utilize natural infrastructure such as forests and floodplains. c. Embrace innovation and new technologies. d. Encourage regional approaches among water users sharing watersheds. e. Incorporate successful approaches from other parts of the world." The Delta Conveyance Proposed Project Fails to Embody the Principles Required in 3 a-e. 3 a-e require that any component of the Water Resiliency Portfolio, including modernizing Delta water conveyance, must embody these principles. The Delta Conveyance Proposed Project Does Not Prioritize Multibenefit Approaches That Meet Multiple Needs at Once. The Delta Conveyance Proposed Project Fails to "Utilize Natural Infrastructure ... " The Delta Conveyance Proposed Project Fails to "Embrace Innovation and New Technologies". The Delta Conveyance Proposed Project Fails to "Encourage Regional Approaches Among Water Users Sharing Watersheds." The Delta Conveyance Proposed Project Fails to "Incorporate Successful Approaches From Other Parts of the World."
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The Delta Conveyance Project not only ignores the human rights for water for non-SWP customers as they do not benefit at all from the project, but the project proposes to improve protections of water supplies for SWP customers at the expense to the quality and reliability of water supplies of non-SWP customers. Making one group's water rights and supply security superior to and at the expense of another group's is antithetical to the first precept of the EO. A project and alternatives to a project must comply with this fundamental principle of the EO and the current Delta Conveyance Project Proposed Project does not.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	It should be noted that current SWP operations fail to comply with water quality standards on a routine basis and therefore violate the law routinely. Given that the SWP current operations violate the law and this fundamental project alternative screening criteria, the project may not assume that continuation of existing operations and standards of the SWP will not result in violations of the law.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 6, Contract Amendment for Delta Conveyance, " ... the Delta Conveyance Project EIR will assess, as part of the proposed project, potential environmental impacts associated with reasonably foreseeable potential contract modifications." This means that the impacts of all water transfers resulting from new excess capacity created by the Delta Conveyance Project must be completely evaluated in the Delta Conveyance Project EIR as they are proposed to not be included in the impact analysis of the SWP Water Supply Contract Amendment for the Delta Conveyance EIR. How, when, where and how much water transfer volume must be defined to a project level specificity in order to meet this project level impact analysis to cover this other project impact analysis.

754	William L. Martin	The Sacramento-San Joaquin Delta Reform Act of 2009 (Delta Reform Act) establishes the policy of the State of California "to reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency." (Water Code § 85021.) The NOP does not address how the Delta conveyance would comply with this law. The Draft EIR must clearly state an alternative to the proposed tunnel which would in fact fully comply with the Delta Reform Act. Please include such an alternative in the Draft EIR.
754	William L. Martin	Public Trust Doctrine Analysis Will be of Critical Importance in Doing the Quantification Work Required by the Delta Reform Act and the Alternatives Analysis Required by CEQA. DWR must consider the public trust doctrine during all stages of the proposed project, especially when assessing the quantity of water that will be allocated to flow through the Project. But the NOP fails to mention the public trust doctrine altogether, even though the doctrine is crucial in understanding the state's water supply availability. The Draft EIR must include an analysis of the 26 rivers of the Delta watershed that conforms with the public trust doctrine and allows decision makers to make informed, rational decisions about whether the Project is a reasonable or even a feasible alternative.
754	William L. Martin	DWR Must Disclose and Assess the future Reduction in Claimed Needs for the Tunnel Project as a result of New Technologies and Curtailed Exports. Paragraph 3 of Executive Order N-10-19 requires any water resilience portfolio adopted by state agencies to embody the following principles, inter alia: "Utilize natural infrastructure such as forests and floodplains" (¶ 3(b); "Embrace innovation and new technologies" (¶ 3(c); and "Incorporate successful approaches from other parts of the world." (¶ 3) (e.)" This type of information should be assessed and evaluated prior to developing the Project as it would be invaluable in understanding, and likely lessening, the claimed need for the proposed project.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	There are numerous laws and policies that have been implemented over the past several decades to ensure that the Delta, and all of its resources, are protected and enhanced in both the short and long term, and that mandate that DWR and USBR care about maintaining adequate Delta water quality, whether their export contractors want them to or not. Some of the laws and policies that would be squarely violated if DWR and USBR were to carry out their plan to use the tunnel to abandon maintaining adequate Delta water quality in the wake of sea level rise and export water through the tunnel that is needed to maintain that quality include the following: – The Delta Protection Act of 1959. – The Delta Protection Act of 1992. – The Watershed Protection Act (11460 et seq.). – The Delta Reform Act of 2009. – The SWRCB's No-Injury Rule for Changes to Points of Diversion. – The SWRCB's D-1641 Delta Water Quality Standards. – The State and Federal Anti-degradation Policies. – The State and Federal Endangered Species Acts.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	(a) Assuming, on the other hand, that it is DWR's plan to use the project to abandon the maintenance of adequate Delta water quality in the wake of sea level rise: In this situation, the EIR must first and foremost thoroughly discuss all of the laws and policies DWR will be violating to the extent DWR intends to export water through the tunnel that is needed to maintain adequate Delta water quality.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	As with the case with sea level rise, the export of water through the tunnel that is needed to maintain adequate Delta Water quality is directly contrary to the numerous laws and policies, including the following: – The Delta Protection Act of 1959. – The Delta Protection Act of 1992. – The Watershed Protection Act (11460 et seq.). – The Delta Reform Act of 2009. – The SWRCB's No-Injury Rule for Changes to Export Intake Locations. – The SWRCB's D-1641 Delta Water Quality Standards. – The State and Federal Anti-degradation Policies. – The State and Federal Endangered Species Acts.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR must first and foremost thoroughly discuss all of the laws and policies DWR will be violating when it decides to abandon the maintenance of adequate Delta water quality in the wake of levee failures and export water through the tunnel that is needed to maintain that quality.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	State and Federal Anti-degradation Laws: This project could rightfully be renamed to "the Delta Water Quality Degradation Project." At the end of the day, even setting aside DWR's sinister intents discussed above, any Sacrament River freshwater that is diverted into the tunnel in lieu of allowing it to flow into and through the Delta, as it must do in the absence of a tunnel, necessarily causes degradation of Delta water quality. In essence, a tunnel such as this, with its intakes in the northernmost portion of the Delta, is the absolute worst project that could ever be conceived if the avoidance of degradation to Delta water quality was something DWR was even remotely interested in achieving. In any event, the EIR must thoroughly explain how the operation of this "Degradation Project" will somehow not violate the state and federal anti-degradation laws.
767	Kelley Taber City of Stockton	The Delta Plan contains policies, recommendations, and performance measures designed to protect the Delta environment and existing Delta land uses from the impacts of major new projects, including the proposed Project. The Delta Reform Act requires that projects within the boundaries of the Delta that will significantly impact the achievement of the statutorily-established coequal goals for protection of the Delta and provision of a reliable water supply demonstrate consistency with the coequal goals and each of the regulatory polices contained in the Delta Plan before the project may be implemented. (Wat. Code, §§ 85054, 85057.5, 85225; Cal. Code Regs., tit. 23, § 5002, subd. (b)(1).) The Delta Plan also contains priority recommendations that identify actions "essential to achieving the coequal goals" (Delta Plan, p. ES-17) and performance measures related to meeting the Delta Plan goals and policies. (Delta Plan, Appendix E: Performance Measures for the Delta Plan, as amended Apr. 26, 2018.) The EIR must evaluate the Project's consistency with all relevant Delta Plan policies, recommendations, and performance measures. Project impacts to the City of Stockton's water supply will be inconsistent with specific Delta Plan policies and the coequal goals themselves. Any impacts to the availability or reliability of Stockton's water supply must be acknowledged and avoided or fully mitigated.
771	Melinda Terry California Central Valley Flood Control Association	Under California law, no modification to the SPFC system (encroachment or project) may be constructed on or near the Sacramento and San Joaquin Rivers or their tributaries until plans have been reviewed and the projects have been approved or a permit issued by the CVFPB. The Board authorizes use of the SPFC facilities by issuing encroachment permits only if the project is compatible with the flood system and will not hamper the State's O&M responsibilities.

771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Interference with long-standing levee maintenance and repair programs in the Delta through usurpation of habitat mitigation opportunities on which these programs depend
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Regulatory constraints on implementing mitigation (e.g., USACE's no vegetation on project levees policy, obtaining anticipated dredging permits);
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Impacts reducing the current level of flood protection achieved with recent Prop. 13, 1E, and 84 investments;
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: FEMA building requirements and NFIP flood insurance eligibility;
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Increase in FEMA flood insurance rates and building restrictions, or PL 84-99 eligibility problems as a result alteration of the Delta levee system.
773	Deanna Sereno Contra Costa Water District	In March 2016, the California Department of Water Resources (DWR) and CCWD reached a mutually beneficial agreement to address impacts of any new Delta conveyance facility on CCWD's facilities, water quality, and water supply. The settlement agreement was made possible by both parties' commitment to focus on solutions within California's divided but interconnected water community. In recognition that DWR had not decided whether or on what conditions to approve DWR's previously proposed Bay Delta Conservation Plan/California WaterFix Project (BDCP/CWF), the March 2016 settlement agreement contemplated that its provisions would remain in effect for any "amendment, modification, supplement or replacement" of the BDCP/CWF. The agreement identifies the components and parameters of the BDCP/CWF that would constitute a "Conforming Action Alternative," which includes a facility to convey water from one or more new water diversion intakes located along the Sacramento River to the State and/or Federal pumping facilities in the south Delta ("Conveyance Facility"). The facilities proposed in the Delta Conveyance Project are consistent with the Conforming Action Alternative in the settlement agreement. As illustrated in Figure 1 of the NOP, the Delta Conveyance Project will be constructed in the vicinity of CCWD's Delta water supply intakes and potentially cross under a key CCWD pipeline. The March 2016 settlement agreement will ensure that CCWD's facilities will be protected during construction.

773	Deanna Sereno Contra Costa Water District	Re: March 2016, the California Department of Water Resources (DWR) and CCWD reached a mutually beneficial agreement to address impacts of any new Delta conveyance facility on CCWD's facilities, water quality, and water supply. The agreement also provides for mitigation that is responsive to actual Delta Conveyance Project operations, not tied to a specific project capacity. Operation of the Conveyance Project would cause water quality impacts at CCWD's Delta intakes and affect CCWD's ability to fill Los Vaqueros Reservoir. To compensate for these impacts, the agreement requires that a portion of CCWD's water supply will be conveyed to CCWD's system from a higher quality source. The water to be conveyed will be a portion of CCWD's existing water supply; CCWD will not receive any new water. The amount of water to be conveyed to CCWD will be determined by the operation of the Delta Conveyance Project in any given year.
776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	These San Francisco Bay Conservation and Development Commission (BCDC, or the Commission) staff comments are based on the Commission's laws, the McAteer-Petris Act and the Suisun Marsh Preservation Act, and the Commission's policies, the San Francisco Bay Plan (Bay Plan) and the Suisun Marsh Protection Plan (Marsh Plan).
781	Janet Wall Wintu Audubon Society	The EIR must analyze whether the project is consistent with the Delta Reform Act and its policy of reduced reliance on the Delta.
783	Mark Miyoshi Winnemem Wintu Tribe	Shasta Dam is the keystone to the Central Valley Project and its construction began the transformation of Northern Central Valley Rivers and all their wondrous, diverse and abundant life into sterile water pipelines serving a money based economy moving headlong to disaster. The Delta Conveyance Project is part and parcel to this unspoken and unacknowledged ecological madness.

789	Jeff Henderson Delta Stewardship Council	Water Code section 85057.5(a) provides a multi-part test to define what activities would be considered covered actions. Based on the Project location and scope described in the NOP, the Project appears to meet the definition of a covered action because it: 1. Will occur in whole or in part within the boundaries of the Legal Delta (Wat. Code, §12220) or Suisun Marsh (Pub. Res. Code, §29101).The new Project alignments (i.e., central tunnel corridor and eastern tunnel corridor shown on NOP Figure 1, p. 4) and facilities (i.e., intakes, tunnel reaches and shafts, forebays, pumping plant, and South Delta conveyance facilities described on NOP p. 3) would be located in the Legal Delta.2. Will be carried out, approved, or funded by the State or a local public agency. DWR, a State agency, would carry out and approve the Project.3. Will have a significant impact on the achievement of both of the coequal goals or the implementation of a government-sponsored flood control program to reduce risks to people, property, and State interests in the Delta. The Project would construct and operate new conveyance facilities in the Delta, including a single-tunnel facility designed to increase reliability of water supply, and would add to existing SWP infrastructure. The Project proposes to size new north Delta facilities to convey up to 7,500 cfs of water from the Sacramento River to SWP facilities in the south Delta to increase reliability of water supply under varying earthquake, climate change, and regulatory conditions. It would also include mitigation and operational characteristics that would contribute to ecosystem restoration. Therefore, the Project would have a significant impact on achievement of both coequal goals. 4. Is covered by one or more of the regulatory policies contained in the Delta Plan (Cal. Code Regs., tit. 23, §§ 5003-5015). Delta Plan regulatory policies that may apply to the Project are discussed below. In addition, DWR previously submitted a Certification of Consistency with the Delta Plan to the Council for the proposed California WaterFix project (which was subsequently withdrawn). Although the NOP describes a new project, the Project scope and facilities described in the NOP are similar to California WaterFix and will likely implicate a similar range of Delta Plan policies.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy RR P1 (Cal. Code Regs., tit. 23, § 5012) calls for the prioritization of discretionary State investments in Delta flood risk management, including levee operation, maintenance and improvements. Policy RR P1 further establishes interim priorities to guide such investments. The EIR should describe if and how DWR has incorporated the prioritization of state investments in Delta levees and risk reduction to the extent that modifications of Delta levees will be required as part of the Project.
796	Byron Nelson, Jr. Hoopa Valley Tribe	Federal reclamation law establishes a first priority for use of the CVP water developed by the Trinity River Division (TRD) for restoration, preservation and propagation of Trinity River fish and wildlife, and economic development of the Hoopa Valley Tribe and other water users downstream of the TRD. Any alternatives considered for long-term operation with the CVP must consider ways to fully implement the mitigation, restoration, preservation, and propagation of fish and wildlife and Hoopa Valley Tribe economic development as mandated by Congress and required by the United States' and the State's obligations.

796	Byron Nelson, Jr. Hoopa Valley Tribe	In summary, no coordinated CVP-SWP operations should be undertaken without full recognition and implementation of the Congressional priorities and mandate to mitigate, restore, preserve; and propagate fish and wildlife and provide for economic development of TRD water in the Trinity/Klamath basin. The Hoopa Val1ey Tribe depends on the water and fish of the Trinity and Klamath Rivers and the EIR must recognize that the Bureau of Reclamation, as trustee to the Tribe, must exercise its statutory and contractual authority to the fullest extent to protect the tribal resources and the in-basin water needs. The Secretary must identify and avoid any impacts in any program it undertakes to make water deliveries to CVP contractors whose entitlement to use CVP water is manifestly junior to the Tribe's right under reclamation law to CVP water.
796	Byron Nelson, Jr. Hoopa Valley Tribe	Recognize Priorities for use of TRD water downstream of Lewiston Dam. As described above, the Trinity River Fishery Restoration ROD of 2000 resulted from Congress's requirement in CVPIA Section 3406(b)(23). In that subsection, Congress directed that the ROD concerning "the minimum Trinity River instream fishery releases established under this paragraph [(b)(23)] and the operating criteria and procedures referred to in subparagraph (A) shall be implemented accordingly." Thus, federal law demands compliance with the ROD. The ROD provides detailed flow releases for each day, depending on the water year type. These are mandatory. It also projects that "long-term average water expo1is to the Central Valley would be 630,000 acre-feet." Further, Proviso 1 TRD water for fishery preservation and propagation is also established in the 2017 FARs ROD. There may be additional Proviso 1 needs identified in the future, which also will have p1iority over diversions to the CVP. 1955 Act Proviso 2 water for economic development must also be protected from export. Accordingly, the EIR must make no assumption that, on average, more water can be exported from the Trinity System to the CVP DWR coordinated operation than the amounts required to fulfill Proviso 1 and Proviso 2 priorities. Only water surplus to the flow releases of those provisos, and other federal obligations, is available to the coordinated operations of the CVP and SWP.

796	Byron Nelson, Jr. Hoopa Valley Tribe	Model water deliveries in recognition of 1955 Act priorities for use of Trinity River water. The second exception in Section 2 of the 1955 Act states: "That not less than 50,000 acre-feet shall be released annually from the Trinity Reservoir and made available to Humboldt County and downstream water users." That mandate requires the annual 50,000 acre-feet release from the Trinity Division to be made in such a way that the water will be available for use by Humboldt County and downstream users. In other words, the 50,000 acre-feet comes with the attributes of TRD storage, regulation and scheduling. The State of California issued several permits for the Trinity Division. Permit 11968 includes conditions that limit diversions. Permit Condition 9 states "Permittee [Bureau of Reclamation] shall release sufficient water from Trinity and/or Lewiston Reservoirs into the Trinity River so that not less than an annual quantity of 50,000 acre-feet will be available for the beneficial use of Humboldt County and other downstream users." Permit Condition 10 states : "This permit shall be subject to the prior rights of the county in which the water sought to be appropriated originates to use such water as may be necessary for the development of the county, as provided in Section 10505 of the Water Code of California." In the Department's previous planning, such as the Delta Plan planning process, it appears that modelers assumed that the 1955 Act's reserved 50,000 acre-feet of water could be treated as available for diversion to the Central Valley . This is unlawful. In 1979 the Solicitor of the Department of the Interior reviewed the legal status of the fishery flow releases and the 50,000 acre-feet of water developed and controlled by the Trinity Division. The Solicitor wrote: On occasion the Congress has specifically limited the Secretary's discretion in meeting the general CVP priorities. For example, in authorizing the Trinity River Division of the CVP in 1955, Congress specifically provided that in-basin flows (in excess of a statutorily prescribed minimum) determined by the Secretary to be necessary to meet in basin needs take precedence over needs to be served by out-of-basin diversion. See Pub. L. No. 84-386, §2. In that case, Congress' usual direction that the Trinity River Division be integrated into the overall CVP, set forth t he beginning of section 2, is expressly modified by and made subject to the provisos that follow giving specific direction to the Secretary regarding in-basin needs. Memorandum opinion from the Solicitor to the Assistant Secretary, Land and Water Resources 3-4 (December 7, 1979) (1979 Opinion). See also Memorandum from Solicitor to Secretary (M- 37030) re Trinity River Division Authorization's 50,000 Acre-Foot Proviso and the 1959 Contract between the Bureau of Reclamation and Humboldt County, December 23, 2014. So long as the EIR does not confirm that the 50,000 acre-feet entitlement for the Trinity Basin is unavailable to the CVP-DWR coordinated operation, it will significantly overstate the water benefits of the alternatives under consideration.
822	Karen Coffee	The impact on the zoning authorized by law on my parcel at 36560 Riverview Drive, Clarksburg, CA 95612.

826	Melinda Terry North Delta Water Agency	NDWA has an ongoing statutory mandate under California law to assure that the lands within the North Delta have a dependable supply of water of suitable quality sufficient to meet present and future beneficial uses.2 Representing nearly one-half of the legal Delta, the Agency's boundaries encompass approximately 300,000 acres. This includes all of that portion of the Sacramento-San Joaquin Delta, as defined in Water Code Section 12220, situated within Sacramento, Yolo and Solano Counties, including New Hope Tract, Canal Ranch and Staten Island in northeastern San Joaquin County. In 1981 the NDWA and the Department of Water Resources (DWR/Department) executed the Contract for the Assurance of a Dependable Water Supply of Suitable Quality (1981Contract). The 1981 Contract requires DWR to meet certain water quality criteria that vary from month to month, and from year to year, based on the Four River Basin Index; with the criteria at seven water quality monitoring locations based on the 14-day running average of mean daily electrical conductivity (salinity levels). The 1981 Contract also contains provisions pertaining to physical changes that obligate DWR to avoid or repair damages from hydrodynamic changes, and if necessary, require limitations on the operations of the SWP pumps and reservoirs in order to maintain water quality compliance.
853	Susan Alexander	The EIR should analyze the cumulative impacts of the Delta tunnels in the context of the new Trump administration Biological Opinions for the Trump Water Plan, the BOR plan to raise Shasta Dam, the long term operations of the State Water Project, and the proposed Sites Reservoir. Would these new projects and rules be used to fill the tunnels?
853	Susan Alexander	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta as a water source.
854	Isaac Kinney	Include this environmental analysis as a package with the Governor's other water infrastructure projects to get a comprehensive analysis of the environmental ramifications of this and all in his portfolio.
865	Phyllis Bala	The negative impact of Sites Reservoir will be extremely costly for many reasons, by increasing the water removal from the Sacramento and Trinity Rivers. This negative impact will affect the public, tribes & their lands, aquatic wildlife & our natural environment on many levels. Please reconsider your decisions & take the following into deeper consideration.
879	Inder Preet Singh Caltrans District 4	All proposed encroachments for the Delta Conveyance Project within existing State Highway right of way must meet Caltrans policies. In particular, encroachments must meet policy requirements in Chapter 17 of the Caltrans Project Development Procedures Manual (PDPM).
879	Inder Preet Singh Caltrans District 4	Contra Costa County and Contra Costa Transportation Authority (CCTA) will need to carefully review the Delta Conveyance Project alternatives and ensure that all encroachments within future SR239 proposed alignments meet Chapter 17 of the PDPM.
880	Muriel Strand	Factors to be considered for a complete and robust analysis of this project include: 1. How will this project fit in with California's whole plan for current and future water storage and conveyance?

884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta. How is it anywhere close to conceivable that this water grab will be anything but detrimental to the waterways and life on and in the CA Delta?
891	Alice Neuhauser	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
895	Jorge De Cecco	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
964	Stephen Rosenblum	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
966	Du Ng	The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.
1004	Blythe Reis and Mark DuPont	The EIR should analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta.

Table D-8. Comments Regarding Permitting

Letter	Commenter Name, Affiliation	Comment Text
14	Andrea Buckley Central Valley Flood Protection Board	The DCP facilities located within, under or adjacent to regulated streams under Board jurisdiction may require the submission of an encroachment permit application to the Board for approval prior to construction.
14	Andrea Buckley Central Valley Flood Protection Board	Ill. CVFPB Role as Non-Federal Sponsor for Purposes of Section 408 The DEIR and supporting documents should properly reference the Board as the nonfederal sponsor for any project proposed to modify a SPFC facility. Even if the "project" is determined to be exempt from Board authority per Water Code § 8536, the State retains the obligation to ensure those projects are compliant with the Operations and Maintenance Manuals and Assurance Agreements given to the USACE by the State. Recommendation: The DEIR should identify the potential flood effects to the SPFC that may result from constructing and implementing the proposed DCP. Project features and planning should be approved by the Board either under its permitting authority or in conjunction with its duties as the non federal sponsor for levee modification projects requiring USACE approval.
23	Ryan Hernandez Contra Costa County Water Agency and County of Contra Costa	Due to both the massive, multi-county scale of the Delta Conveyance Project ("project"), and the lack of detail in the NOP regarding the location and description of all project components, including ancillary facilities, and identification of the specific entities that would carry out project construction and operation, the County and Water Agency are unable to definitively provide specific details about the scope and content of the environmental information related to the County's and Water Agency's areas of responsibility. Preliminarily, it appears that discretionary County Zoning Code approvals may be necessary for facilities including, but not limited to, access roads, barge unloading facilities, concrete batch plants, fuel stations and mitigation areas. Certain project components may require other discretionary approvals if they are not allowed by right in the zoning district where they are proposed to be located. Additionally, certain project components may require grading permits and/or discretionary permits authorizing surface mining and reclamation may be necessary. The County also has approval authority over geotechnical exploratory drilling, boring and construction of water wells and mitigation monitoring wells, road and highway encroachment permits, and building permits, which are typically ministerial.

24	William Burke County of Sacramento	MWD is among the "local agencies" that "shall comply with all applicable building ordinances and zoning ordinances of the county or city in which the territory of the local agency is situated." (See Gov. Code, § 53091, subd. (a).) Although there may be an exemption to this general rule in the specific context of the location or construction of facilities for the transmission of water, local building and zoning ordinances nevertheless still apply to ancillary support facilities that do not perform the actual function of transmitting water. (See City of Lafayette v. East Bay Mun. Utility Dist. (1993) 16 Cal.App.4th 1005, 1014- 1016.) Only those facilities that have a connection with and are in fact integral to the proper operation of particular storage and transmission functions of water districts qualify for the statutory exemption from local ordinances. (See id., at p. 1015.) Not all support facilities proposed by a water district will qualify for the – statutory exemption. Ancillary facilities that are not directly connected to the unique function of water transmission and need not be located in close proximity to qualifying facilities are not exempt from local ordinances. (See id., at p. 1016.)
24	William Burke County of Sacramento	In addition to these discretionary approvals, COUNTY will have ministerial approval authority over: Geotechnical exploratory drilling, boring and construction of water wells and mitigation monitoring wells pursuant to County Code Chapter 6'.28 and California Water Code section 13700, et seq. and Water Code section 13050 (expressly applicable to both "the State" and "any district"). Road and highway encroachment permits pursuant to Streets & Highways Code section 1460, et seq., Section 146 of the MWD Act, Water Code sections 7032 and 7033, and Sacramento County Code section 12.08.020. Building permit approvals for ancillary support facilities.
364	Barbara Daly	We request that the National Historic Preservation Act, section 106 be conducted, as appropriate -- and very soon.
598	Bill Emlen Solano County	The EIR proposes to only consider alternatives of flow rate capacities ranging from 3,000 to 7,500 cubic feet per second and to the degree of involvement of the CVP. The NOP did not mention assessing a "No Project" alternative, a broad range of conveyance routes, alternatives that do not involve establishing a new conveyance or alternatives for reducing reliance on the Delta. Besides modifications to specific aspects of the Project, other alternatives besides the Project must be developed and analyzed in the EIR. Alternatives reducing exports must also be considered given the mandates of the Delta Reform Act. (Water Code §§ 85000 et seq.) The Act establishes the policy of the State of California "to reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency." (Water Code§ 85021.)

637	Osha Meserve Local Agencies of the North Delta	With respect to review and permitting of the project by other entities, the NOP's uncertain references to the role of the Bureau of Reclamation("BOR")in the project must be resolved prior to release of the Draft EIR. The participation of BOR in the project directly affects the environmental review and permitting process, including the critical issue of which agency would serve as the federal lead under the National Environmental Policy Act. In addition, local and state agencies have authority over various aspects of the project(e.g., roadways, facilities siting, groundwater and flood control structures), which should be clearly described. Without this information, the Draft EIR would not comply with the requirements described in California Supreme Court's Banning Ranch decision.
740	Ryan Hernandez Contra Costa County Water Agency	We recommend the project sponsors request that the appropriate environmental regulatory agencies, such as the USACE, the State Department of Fish and Wildlife, and the State Regional Water Quality Control Board, explore the permits, special conditions, and mitigation that may be necessary for construction within the project area.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Introduction, paragraph 2, " ... likely requiring the preparation of an environmental impact statement (EIS)." The project would require 401 and 404 permits from the USACE prior to construction. The project would also require a Biological Assessment and Biological Opinion to potentially support Incidental Take Permits from US Fish and Wildlife and NOAA Fisheries. Both of these sets of permits create a federal nexus that require a NEPA compliant EIS.
789	Jeff Henderson Delta Stewardship Council	In addition, the Council strongly encourages DWR to obtain a permit for a Change in Point of Diversion from the Water Board prior to submitting a certification of consistency for the Project to the Council. The Council acknowledges that the schedule for a certification is unknown at this point. However, DWR should include the permit in the record supporting the certification to demonstrate consistency with Delta Plan Policy ER P1.

800	Joshua Grover California Department of Fish and Wildlife	CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.)or the Native Plant Protection Act. (Fish & G. Code, § 1900 et seq.) To the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA), the Project proponent may seek related take authorization as provided by the Fish and Game Code.(Fish & G. Code, § 2050 et seq.)At the request of an applicant for an incidental take permit (ITP), CDFW shall, to the greatest extent practicable, consult with the applicant regarding the preparation of a permit application in order to ensure that it will meet the requirements CESA and its implementing regulations when submitted to CDFW.(Cal. Code Regs., tit. 14, §783.2, subd. (b).)
957	Martin Freitas	Fifth, government authorized that water would only be taken from the southern most section of the Delta, specifically where the current forebay is located.

Table D-9. Comments Regarding Project Area and Study Area

Letter	Commenter Name, Affiliation	Comment Text
35	Don Cremin	You need to do rigorous scientific studies to assess the impact on the northern species and quality/quantity of our water. I have read prior scientific studies argued against this project. Do not do this if so.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	We recommend that the DEIR include a map of the project area and show the extent of the impacted areas with Contra Costa County.
160	Diane Kirkham	Commenter cites the following reasons for concerns regarding the Launch Shaft Site A for the Central Corridor for the proposed Delta Conveyance Project as being currently discussed by the Delta Conveyance Design and Construction Authority. (I believe that this is now also the preferred site for Launch Shaft Site A for the Eastern Corridor as well.) 3. Contrary to NOP. The site, as depicted in the maps displayed at the March 11 meeting of the SEC, is partially outside of the Proposed Project Facility Corridor Options as shown on the map included in the NOP for the Delta Conveyance Project (Page 4, Figure 1). How can the DCDCA, without due public notice, just ignore the NOP and go outside the area that DWR published as the area where facilities may be built?
199	John Michael McKown	What is the plan for Elk Slough? The plan will dewater Elk Slough in the Clarksburg area.
271	Isaac Kinney	I do oppose this infrastructure project. Couple misleading outreach materials I see is the map that you had basically looks like the Trinity River runs into the Sacramento. I feel that's very misleading for the public. That is not the case, and to include the Trinity and Klamath River in the scope of work of this project. Also to include with your outreach, like it says in the water portfolio, this project and the Sites Reservoir project are tied at the hip. That is real confusing with how you all kind of single out this project. So making sure that they do go hand in hand, that needs to be a part of the EIR and all of the outreach for this, not just the documents, but the outreach to the public.

279	Margaret Robbins	I request that you expand the scope of the project to include the Trinity River below the dam/reservoir and also the Klamath River, because the Trinity is a major tributary to the Klamath. When you take water away from the Trinity, it affects the Klamath. The Klamath drains into the Pacific Ocean, as you know, and that's where the salmon come up. If you divert water from the reservoirs when they are higher than in the summertime when there is not as much water in the river to sustain the salmon population, there won't be enough water in those reservoirs to let loose to keep the salmon alive. In 2002, we had a massive fish kill on the lower Klamath River. 60,000 fish laid rotting on the banks of the river, because there was not enough water in the river. It got too warm. There was blue-green algae. The fish literally suffocated to death. There is no excess water to take from the Trinity River. You will destroy the salmon population and you'll destroy the lifeways of the tribes that depend on that water and the salmon. Please consider what you're doing and how it affects the people who live on the river.
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	We do not see that the full economic social and environmental costs and benefits of the project have been fully assessed for areas of water origin.
442	Regina Anidrole Save California Salmon	These maps show the reservoirs, but they don't show the rivers for this project. Trinity River goes to water poisoned soils that then puts pesticides and selenium. It's not a reasonable use of water, and it's against the California Constitution, and it's against the public trust of the people of California, and it's not Westlands' water. They are junior water right holders, and tribes are senior water right holders. First in line, first in right. So I think that Governor Newsom needs to think about that. I think he needs to think about saving the salmon. I think he needs to think about who the original people of this land are and how to protect their water sources because their water sources are not just there for the salmon. They're also what's eating the drinking water supply of the whole state. And it's time for Governor Newsom to start coming into our communities and listening and thinking about climate resilience and thinking about the people who depend on water and thinking about the people whose land he's on.

443	Willard Carlson	So I happen to live at a place called Blue Creek. It's a refugee for a lot of king salmon on the Klamath River like a very main tributary, and also I live at a place called Apa, which is right there by Blue Creek. In Cadillac Desert they talk about 800 -- 1,816 foot high mega dam, and that's built right there where my -- the land of my grandfather where I live right now. That -- that proposed dam was -- would raise the river level in Hoopa to 400 foot under water. There was going to be a tunnel put through the Tehachapi Mountains and was going to go to Arizona, the fastest growing state of the union because in a heavy February rainfall day, they said look at all this wasted resource going to the Pacific Ocean. Well, that's kind of like the mindset right now. This water is going into the Pacific Ocean when we could be sending it to making oasis out of the desert. This past year was a very poor fishing season. Usually you have a very good size salmon. Well, I hardly caught any salmon this past year, but there was some Trinity River fish. These were like adult salmon that were only the size of half-pound steelhead. So we have ocean conditions. We have offshore. We have fish farms. And it's okay to kill all the native stocks in salmon because we can have aqua farms coming in, so that's going to take care of the fish, but we live along -- we live along these rivers. Coming up here along the Trinity River I see all these little resorts, places where people come raft, recreational. There's offshore fishermen. There's trout fishermen. There's fly fishermen, and we -- we rely on this resource, so I -- I was hoping that we could come to a conclusion here, work something, maybe resolve this, and hopefully you can -- hopefully you can come to a good decision. If not, I respectfully ask you to withdraw this process.
451	Jeanne France	Taking so much water from the Delta and the Sacramento and Trinity Rivers destroys the north state. It hinders us to be able to have agriculture up here because there won't be enough water for us up here. You're taking it away, and we can't stand it, and we will fight. We're not going to give us up this fight.
454	Georgiana Gensaw	I come from Klamath. I come from Straight Arm, and I am living in now what is known as Klamath, the end of the river. The watershed, it all plays together. And I know you're saying oh, it's not the Trinity. Oh, it's not the Klamath. But the more you pull on the Sacramento, the more you pull on the American, the more you pull on Feather River, the more you pull on those rivers will pull over on ours. And so you say that oh, you're not pulling this, you're not pulling that. We are not dumb. We heard what Trump said. We know he's coming after Trinity water. I hope that you take into account the things that cannot speak for themselves, the trees, the mountains, the soil, all those things that go away when the land goes -- when the water goes away from it. The landslides that you have. You know, we see these tunnels. We follow these tunnels when we go down south. Our kids watch the water where it goes and we have to explain to them yep, that's Trinity water going all the way down to LA so that they can grow things in the desert. This will be one more thing to stress out our river communities, our poor river communities. More meetings that we have to go to stand up again and remind you again that the fish that cannot speak for themselves need to be heard, and we will be here again to tell you again that the river is important, and it needs the water more than Southern California.

458	Annelia Hillman	The State of California has a legacy of raping and pillaging and stealing and destroying the people of this land. The destruction needs to stop, and it needs to stop at this tunnel project. We know that the tunnels manipulate natural flows, and we know that there -- it will affect our communities. It will affect the Klamath River. It will affect the Trinity River. We're not going to stand by and watch this
460	Isaac Kinney	I want to say thank you to the Winnemem Wintu for opening up this place for us to provide this input. State of California is out of its jurisdiction because the state was illegal established through executive order. The materials of this project go over the natural law of the Trinity River flowing into the Klamath. Stop the stealing. Before it was the land, the gold, and now the water. We must remember without the Owens Valley we do not have Hollywood. Without the Hoopa Valley we do not have the Bay Area. Klamath and Trinity River gives me and my family and our community the path to regeneration. This project directly threatens our way of life. This -- the Trinity River feeds my family. It's a part of our religion, a part of our governance systems, and a part of our economic systems. This project is affiliated with short-term jobs, meaning that it's a Band-Aid solution to the employment issues in our state. Please develop indigenous led solutions instead of this obsolete and unstable infrastructure.
465	David Ledger Shasta Environmental Alliance	I'm concerned about this project because of the wide amounts of water that can be sucked out of the Sacramento River. You have down there seven -- the tunnels could take up to 7,500 cubic feet per second, plus you may also run the pumps at the same time. So what I see this as kind of a concern is that this is going to aid towards raising Shasta Dam, and it's just going to be extremely bad on -- not only the Delta but everything upstream of the Delta taking all of that water out or having that possibility to because it would be more pressure on it from ag business in the valley.
471	Jenel McCovey	This is a moral issue. It -- it's between an anadromous fish versus the seeds that can be germinated elsewhere. Age-old gardens have been sold to almond orchards who forgot the senior water rights with it. We talk about the senior water rights of Humboldt County and the Trinity River, and they were a deal at the same time. California water's hierarchy is issuing paper water. It's not real. When you go down the Sacramento River upstream from where the Trinity River comes into the -- to the Sacramento River is a pond of red water from a mine. So that degradation of water is in the Sacramento River, and it mixes with the Trinity. How do you go to the administrators who are doing an Environmental Impact Statement that should be redressed and addressed in a way less legal and scientific. McCovey also told a story of the dance ground, and an elder seeing the spirits looking down. Believes those thousands of spirits are the ones who are coming after us. So we are walking in humanity on Mother Earth as Mother Earth's children, and we need to walk better because with climate change and the degradation of our air, our water, and our fertile soil is -- we need to do better.

472	Lorenita McKinnen	I think water is the most important thing because we can't live without it. Like it is so sad when we go to our dances and we don't have salmon. Like or when I take fish to my aunties and they're so thankful because they don't get it. It's not something that you can get all the time anymore. Pictures from 40 years ago show the river three times the size it is now. The river is something indescribable that you can't replace. And it's devastating to think what is going to happen to the river in the future.
477	Janice Powell Mayor, City of Shasta Lake	Your NOP doesn't include the impacts on the rivers of Northern California. You don't even bother to have them on the maps. So we need to make sure that that NOP has those Northern California tributaries included in the NOP. Also, you say nothing about the fish and the other habitat that will be impacted by this tunnel, and that's a very important part of the project for all of us up here in Northern California.
479	Margo Robbins	I am here to request that you consider the effects to the Klamath and Trinity Rivers in your Environmental Impact Report. I think that you must include the -- the 2000 Record of Decision and also the 50-acre feet that Humboldt County has been guaranteed, that that needs to be included in the modeling. It is mandated by law, and so it needs to take that into consideration. The Klamath and Trinity Rivers already do not have enough water. In 2002 this was the result of not enough water. Does Governor Newsom want to be the author of another fish kill? Because that's what siphoning more water away from the Trinity River will do.
484	Raven Stevens We Advocate through Environmental Review (WATER)	I want to honor the traditional lands of the Winnemem Tribe where we currently stand. My name is Raven Stevens, and I live on the west side of Uytaahkoo or Mount Shasta as you might know it, which is a major source area of California's water, and in Mount Shasta we are the headwaters of the Sacramento River.
486	Tom Stokey Save CaliforniaSalmon	Your claims that Trinity River water is not part of this project are patently false. There is an intertie between the Delta-Mendota Canal, the federal canal south of the Delta, and the California Aqueduct. You regularly pump Trinity River water through state facilities, and you contribute to the decline of the Trinity River and the depletion of cold water storage in Trinity Lake. So I'm going to ask you to include some things in your EIR. One is to be honest that Trinity River water is pumped through state facilities, and it will be pumped through the tunnel.
563	Federico Barajas San Luis & Delta Mendota Water Authority	The operations of the Proposed Project have significant potential to influence the reliability of water supply deliveries from the CVP to Water Authority member agencies. The description of the Project Area in the NOP indicates that "potentially, South-of-Delta CVP Service Areas" will be included. The Proposed Project could cause impacts within Water Authority member agency service areas and therefore those areas must be (as opposed to "potentially") included within the Project Area.
627	Nichelle Garcia	The EIR should analyze the impacts to source waters, and their reservoir storage, including the Trinity, Klamath, Sacramento, Feather, Yuba and San Joaquin Rivers and their tributaries. Water quality impacts from any increased diversions should be included in this analysis.

706	Shelley Ostrowski Westlands Water District	From these past efforts, it is clear that the Proposed Project may impact CVP operations, including operations of the Jones Pumping Plant and San Luis Reservoir and have environmental impacts in the CVP service area. As a result, DWR must: (1) include within the Project area the CVP facilities and the areas where CVP water is used, including the South-of-Delta CVP Service Areas.
714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The ancestral lands and watersheds of the Hupa, Yurok, Karuk, Pit River and Winnemem Wintu tribes should be added to the proposed project area.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	the Draft EIR must include an analysis of the 26 rivers of the Delta watershed that conforms with the public trust doctrine and allows decision makers to make informed, rational decisions about whether the Project is a reasonable or even a feasible alternative. Having a real public trust analysis that includes all non-market public trust resources, including clean water, healthy flowing rivers, healthy abundant fish, and recreational opportunities, is also critical information for a holistic alternatives analysis.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 6, Project Area, "Upstream of the Delta Region" "Upstream" must include SWP facilities that operations are changed in any way due to Delta Conveyance Project operations. This includes all SWP reservoir operations timing and magnitude of water releases and tributaries flow and temperatures downstream from those facilities. These analyses to downstream tributaries below SWP reservoirs are required to assess impacts to fish habitat temperature suitability, spawning habitat suitability (depth, flow velocity and temperatures) and to assess anadromous fish straying and introgression impacts from altered tributary attraction flows and temperatures. Streams upstream of SWP reservoirs are affected by exposure of sediment wedges in the reservoir which affect seasonal fish movement and spawning in the upstream tributaries up to the next impassible fish barrier. All of these areas upstream of the Delta affected by operations of the Delta Conveyance Project must be included in the geographic and impacts scope of the project. This, among many reasons, is why the project must define, disclose evaluate and mitigate the true operations impacts of the project. If the EIR does not analyze the real and fully developed and detailed project operations, the El R will be a programmatic document that cannot be the basis for construction-related permits.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 6, Project Area, "Statutory Delta (California Water Code Section 12220)" Proposed Project flow impacts alter the timing, magnitude and water quality of delta outflows such that the San Francisco Bay complex, Suisun Marsh, Napa River and Pacific Ocean resources are affected. The BDCP and WaterFix impact areas, with exactly the same types of general locations of proposed facilities as the Delta Conveyance Project, were required to also include the Napa River, Suisun Marsh, San Francisco Bay and the Pacific Ocean in their project impact analysis area. DWR was the Lead Agency for those previous documents. If DWR is to depart from the analytical standards and methods of these previous documents, it must present a strong, defensible and compelling logic for the departure from these previous plans, policies, procedures and precedents.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 6, Project Area, "South-of-Delta SWP Service Areas and, potentially, South-of-Delta CVP Service Areas)" The project impact assessment area must also include drainages that are downstream of the SWP and CVP service areas as water deliveries from the project affect the timing, quality and magnitude of flows and resources in these tributaries and drainages. SWP service areas drain all the way back to the Delta, Salton Sea or Pacific Ocean depending on which service area and or if the CVP is included in the project.
774	Don Hankins California Indian Water Commission	To understand the ecocultural context of the planning area, DWR should become familiarized with points of analysis noted in Hankins (2018), which discusses many problems related to water management impacts from a tribal perspective. It is recommended that this should be the starting point of this analysis. It is also recommended that the analysis consider testimony provided to the State Water Resource Control Board regarding the point of diversion for the Water Fix as key points for analytical understanding.
783	Mark Miyoshi Winnemem Wintu Tribe	The NOP does not adequately and completely describe both the source and destination of the water that will flow through the Project tunnel. The Trinity River is not even on the NOP map and yet half of the flow of the Trinity could be earmarked by the CVP to be directed south of the Delta, heavily impacting the Trinity ecosystem, its wildlife and the indigenous people who depend on that river for food and cultural meaning. The diversion of Trinity River water and the role of the CVP must be explicitly reviewed if this EIR is to be valid and meaningful.
787	William Huber	Westlands is a huge water district, perhaps largest and thirstiest in the state, maybe the nation. It's basically desert land, fouled by selenium salts. To even think of irrigating it, it first has to be ripped, and washed with vast amounts of clean water, and that tainted water then drained off with under drains installed. Westlands wants clean water free or cheap, and lots of it. They then want to drain off their salt polluted water to waterways, abdicating any responsibility. This is NOT the best use, nor even a beneficial use of the water. It is Bad for the Trinity River, and by connection, the South Fork Trinity River and The Klamath River and all of these rivers fisheries. The Delta Conveyance project will be detrimental to the Klamath Trinity River System. It will be detrimental to the Sacramento-San Joaquin River Delta by altering the ecosystem, already damaged by agriculture and pumping at Tracy.
792	Sarah Salisbury	The scope of the EIR is insufficient. The Trinity River complex is not included (see tribal responses). Nor was the Feather River complex (the area where I live). To proclaim, as the presenters did, that there was no reason to include those river systems, since the project will be constructed south of these areas, is disingenuous at best, deceptive, insulting, and, at the worst, a craven lie.
793	Rebekah Olstad	The EIR should analyze the impacts to source waters, and their reservoir storage, including the Trinity, Klamath, Sacramento, Feather, Yuba and San Joaquin Rivers and their tributaries. Water quality impacts from any increased diversions should be included in this analysis. The EIR must analyze the tunnel's consistency with the Delta Reform Act's policy of reduced reliance on the Delta as a water source.

794	Stacy Sebring	I live in Trinity County California , specifically Hyampom on the South Fork of the Trinity River. All of us in the Trinity River drainages have watched the fisheries decline since the building of Trinity Dam. Last years report on Salmon numbers in the Trinity River was very grim. Very low with prospects for future runs looking seriously poor. I am writing in complete disagreement to the Delta Tunnel Project. It will end up taking way more water than already taken for Ag use to the South. You need to study how your project will end up affecting the South Fork Trinity River and all other tributaries to the Trinity. The Trinity River is NOT a tributary of the Sacramento River!!! It is the largest tributary to the Klamath, and in it's natural state, added much need fresh, cold water to the Klamath system. This is a time for restoration NOT NEW DIVERSIONS!
796	Byron Nelson, Jr. Hoopa Valley Tribe	In summary, no further planning for the Bay-Delta should occur that assumes the availability for diversion of any Trinity River water resources that are committed by law to the Trinity River Basin and its communities. The EIR should preclude the availability for use in a delta conveyance water allocated to: the ROD flow releases; the 50,000 acre-feet of additional Trinity Division water for Humboldt County and downstream users; the carryover storage for preservation of temperatures needed for the Trinity River fishery; or the area of origin rights of Trinity County.
820	Clark Tuthill	After listening to DWR's opening statement in the March 7, 2020 Redding CA presentation, it was very apparent that water taken from the Trinity River to support the single tunnel project was entirely omitted. That is just wrong. The water has to come from some place. The tunnel project will take an additional 6,000 cfs of water. That is an entire river. The Trinity runs at 450 cfs in the summer and the releases drop to 300 cfs in the winter. There is no way this project can be built without taking additional water from the Trinity River, and the entire water system connected to the CVP.
830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	THE EIR MUST ANALYZE AND EVALUATE INPUTS FROM AND IMPACTS ON THE UPPER SACRAMENTO WATERSHED The original twin tunnels could have dewatered the Sacramento River in some years and seasons prior to meeting the delta. Without inclusion of the entire Sacramento watershed in the analysis the state will be essentially leaving out critical information on downstream flows. Ultimately this would overestimate the available water for conveyance in the tunnel and could lead to increased interest in raising Shasta Dam, which would further impact the communities in our region.

830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	OTHER STATE AGENCIES REQUIRE INCLUSION OF MEDICINE LAKE VOLCANO IN LARGE SCALE, WATERSHED STUDIES THAT INCLUDE THE SACRAMENTO RIVER. A recently passed bill, AB 2528 identifies climate resilient habitat areas that offer the best opportunity to remain ecologically productive and amends the Climate Adaptation Strategy to include definitions of four watershed zones: salmon and steelhead strongholds, spring-fed source watersheds, mountain meadows, and estuaries. Source waters are defined as any system in the Cascade Mountains, Modoc Plateau, and Feather River headwaters that provides groundwater recharge to extensive volcanic aquifers that store and release large quantities of groundwater to spring-fed rivers. By adding these zones, the bill requires the Natural Resources Agency to research the importance of these resilient watershed areas in its next Climate Adaptation Strategy. These stronghold source watersheds include groundwater in the Medicine Lake Highlands, within the Modoc Plateau that acts as source water for downstream fisheries systems. The State has developed the justification below as rationale for supporting the Modoc Plateau stronghold. In the 2018 IRWM update, Medicine Lake Highlands were included in the Upper Sacramento River (USR) boundaries because of the surface water flow contributions to Shasta Lake. The Plan notes that most of the water storage in USR is in the groundwater basins, including Medicine Lake Highlands. According to the USR IRWM plan, "It is hoped that the IRWM implementation process will result in further gathering of baseline hydrologic data on the Medicine Lake Volcano and the Fall River Springs. Because the recharge area is located in the USR and the discharge is in the Upper Pit IRWM Region, projects would be inter-regional in their implementation and results." Unfortunately, the UPR IRWM plan, while referenced above, provides little detail or guidance regarding groundwater from the MLH. Regardless, the USR watershed includes the Medicine Lake Highlands and thus should be part of the Delta Conveyance study.
853	Susan Alexander	The EIR should analyze the impacts to source waters, and their reservoir storage, including the Trinity, Klamath, Sacramento, Feather, Yuba and San Joaquin Rivers and their tributaries. Water quality impacts from any increased diversions should be included in this analysis.

Table D-10. Comments Regarding Baseline

Letter	Commenter Name, Affiliation	Comment Text
10	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	2] Current and projected future environmental base lines -- independent of any project -- need to be thoroughly developed in the context of evidence of accelerated Global Warming, in as much as that base line directly effects and exacerbates most if not all, negative impacts of the project. The best science available will be critical on this, since just within the last few years the temperature and related impact parameter predictions on climate change have significantly increased. This notably includes, of course, an accelerating rise in sea level. Some projections are now showing a 6' rise by 2100. And, a global temperature rise, from 2018 estimates of around 5 degrees, to new model estimates of up to a 10 degrees rise. Acceleration, in this case, is a profound indicator that certain tipping points may have already been passed. Scientists have been relatively conservative about climate change projections, not wanting to be seen as being alarmists. The result has been that past climate modeling predictions have generally underestimated the probable increase in the range of global warming temperatures. A consequence of caution portends a dynamic that future modeling will also tend toward further increases in global temperature projections. Analysis for this project will need to encompass the possibility of the additional negative impacts from this phenomenon.
561	Diane Riddle State Water Resources Control Board	The EIR should evaluate the effects of the Project with the Department of Fish and Wildlife's Incidental Take Permit (ITP) and with and without recent (2019) changes to U.S. Fish and Wildlife Service (FWS) and National Marine and Fisheries Service (NMFS) Biological Opinions (BiOps) for the long-term operations of the CVP and SWP. It is important to understand the effects of the changes from the 2019 BiOps in combination with the proposed project because the State has filed suit on the 2019 BiOps which may result in modifications or invalidation of the BiOps. In addition, these changes were made very recently so are not well understood. These changes could also have large effects on export operations and Delta hydrodynamics as well as aquatic species (Reclamation's EIS identifies that the 2019 BiOp changes could result in increases in exports of up to 600 thousand acre-feet per year on average given existing infrastructure). These effects in combination with the effects of and the Project should be evaluated and disclosed.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	CEQA requires that the proposed project and alternatives be analyzed against the existing environmental conditions (the "environmental baseline"), in order that the Project's environmental impacts can be meaningfully analyzed and compared to alternatives. Cal. Code Regs., tit. 14, § 15125(a); see County of Amador v. El Dorado County Water Agency, 76 Cal.App.4th 931, 952 (1999); Neighbors for Smart Rail v. LA County Metropolitan Transit Authority, 57 Cal. 4th 310, 315 (2013). That environmental baseline is generally existing conditions at the time of the Notice of Preparation. Cal. Code Regs., tit. 14, § 15125. Under CEQA, the DEIR must "delineate environmental conditions prevailing absent the project, defining a 'baseline' against which predicated effects can be described and quantified." Neighbors for Smart Rail, 57 Cal.4th 439, 447 (2013) (citing Communities for a Better Environment v. South Coast Air Quality Dist., 48 Cal.4th 310, 315 (2010)). The purpose is to provide a "realistic baseline that will give the public and decision makers the most accurate picture practically possible of the project's likely effects." Neighbors for Smart Rail, 57 Cal.4th at 449 (citing Communities for a Better Environment, 48 Cal. 4th at 322, 325, 328). The NOP was issued on January 15, 2020. Accordingly, the environmental baseline should include the operational requirements under CESA and the ESA that were in effect on that date, including the full requirements of the 2008 and 2009 biological opinions and the related incidental take permits and consistency determinations under CESA for operations of the SWP. In addition, although the vast majority of the habitat restoration requirements of those prior CESA/ESA permits had not been implemented at the time of the NOP, excluding these existing mitigation and compliance obligations from the environmental baseline in this DEIR would bias the environmental analysis and would be misleading to the public and decisionmakers. See Neighbors for Smart Rail, 57 Cal. 4th at 457.
576	Kelley Taber Sacramento County Water Agency	Impact analyses that depend on Sacramento and San Joaquin River and Delta hydrologic conditions (including impacts to water quality, water supply, and public facilities that divert water from or discharge into the Sacramento-San Joaquin River Delta) must utilize a baseline that accurately reflects conditions at the time the Project is expected to begin operations, as well as reasonably foreseeable future conditions. Operational impacts to groundwater resources, Delta water quality and FRWP operations will occur immediately upon commencement of Project diversions and near-term impacts may be substantially different from those occurring farther in the future, when background hydrologic conditions will be substantially different due to the effects of climate change.

615	Justin Fredrickson California Farm Bureau	Alternatives and impact analyses in the EIR, including the No Action analyses, should look at impacts to agricultural lands and socioeconomics, and at other related impacts including groundwater impacts and air quality, not only in the Delta proper, but also in the SWP and CVP export service areas. To meaningfully inform, the environmental baseline should include water supply effects under existing and reasonably foreseeable future regulations within the project planning horizon, including federal and state operating criteria, State Water Board water quality requirements, and long-term implementation of SGMA. Alternatives might also consider different possible baseline water supply scenarios within the context of statewide efforts to implement the Administration's proposed Water Resilience Portfolio. While, admittedly, this may exceed the scope and level of analysis required with respect to the proposed Delta Conveyance Project itself, there should be room for such considerations in the alternative formulation, project description, and environmental setting portions of the EIR. Because the proposed project is so closely connected to the extended network of California's statewide water system, though perhaps not required, additional effort in this area could well lead to a project better informed by this comprehensive, system-level perspective.
662	John McManus Golden Gate Salmon Association	The NOP was issued on January 15, 2020. Accordingly, the environmental baseline should include the operational requirements under CESA and the ESA that were in effect on that date, including the full requirements of the 2008 and 2009 biological opinions and the related incidental take permits and consistency determinations under CESA for operations of the SWP. In addition, although the vast majority of the habitat restoration requirements of those prior CESA/ESA permits had not been implemented at the time of the NOP, excluding these existing mitigation and compliance obligations from the environmental baseline in this DEIR would bias the environmental analysis and would be misleading to the public and decisionmakers. See Neighbors for Smart Rail, 57 Cal. 4th at 457.
675	Terrie Mitchell Sacramento Regional County Sanitation District	The EIR Must Use a Baseline that Accurately Depicts Impacts Throughout the Life of the Project: Impact analyses that depend on the Sacramento and San Joaquin River and Delta hydrologic conditions (including impacts to water quality, water supply and public facilities that discharge into or divert water from the Sacramento-San Joaquin River Delta) must utilize a baseline that accurately reflects conditions at the time the Project is expected to begin operations, as well as reasonably foreseeable future conditions. Operational impacts to Delta water quality and Regional San's operations will occur immediately upon commencement of Project diversions and near-term impacts may be substantially different from those impacts occurring farther in the future, when background hydrologic conditions will be considerably different due to the effects of climate change.

683	Jeff McCormack Reclamation District 1002	The East-West roads throughout Reclamation District 1002 connect the San Francisco Bay Area markets, ports and airports with 2 pf California's major North-South freeways, I nterstate-5 and Hwy. 99. Those carry travelers between the Bay Area, and Sacramento, Stockton and Los Angeles, as well as Oregon and Washington, Mexico & Canada. Past floods here in 1986 closed I-5 for weeks, requiring re-routing of truck traffic nationwide. Likewise, in 2017, storms on the Cosumnes River near Elk Grove caused railroad derailment on the south edge, requiring re-routing of rail traffic. Climate change forecasts predict that this will happen more frequently in the future, both as to frequency and extremity, so your potential disruption of I-5 will be on top of that future environmental scenario going forward. Therefore, your EIR should include that baseline, and your engineers should design around that scenario.
683	Jeff McCormack Reclamation District 1002	Part of your engineering design should look beyond the direct impacts of a preferred baseline scenario to a changed environmental baseline sea level rise, as well as more frequent flooding and spikes of even more extreme events on top of those other 2 factors. Therefore, if ever approved, your facilities should have ring levees around them as 2nd line of defense, after strengthening of reclamation district levees as your 1st line of defense.
767	Kelley Taber City of Stockton	Impact analyses that depend on Sacramento-San Joaquin River and Delta hydrologic conditions (including impacts to water quality, water supply, and public facilities that divert water from or discharge into the Sacramento-San Joaquin River Delta) must utilize a baseline that accurately reflects conditions at the time the Project is expected to begin operating as well as reasonably foreseeable future conditions. Operational impacts to surface water resources and Delta water quality will occur immediately upon commencement of Project diversions and near-term impacts may be substantially different from those occurring farther in the future, when background hydrologic conditions will be substantially different due to the effects of climate change.

Table D-11. Comments Regarding Economic Impacts

Letter	Commenter Name, Affiliation	Comment Text
48	Libby Lucas	Request you also address these specific areas of concern: - financial loss to fishing industry in Delta, San Francisco Bay, and Pacific Ocean with diminished fish populations
81	Jan Warren	There needs to be a cost benefit analysis, which has been asked for repeatedly for a decade.
87	Jaclyn Shaw	(3) CONCRETE COSTS start with, what now, $16 trillion? Is it more than one million per Desalination plant? Can Tracy River, mean saying we're doing Desalination or Smart Water?
145	Meredith Cooper	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs.
151	Felice Pace	The EIR MUST Fully disclose who the conveyance will benefit and who it will hurt both economically and culturally. The dollar value of those costs and benefits should be disclosed.
153	Charles Wilson Southern California Water Coalition	Southern California's $1.6 trillion economy depends on a reliable supply of water from the State Water Project as part of the planning for future water supply resiliency. Thirty percent of our water supply comes from the State Water Project in an average year, sustaining life in our homes, businesses, communities, farms and environment. This water supply is not just alimental, it is one of the most affordable. The costs associated with alternative water supply solutions such as desalination, contaminated groundwater clean-up and stormwater capture and reuse can be significant and hard to meet in disadvantaged communities. By contrast, high-quality water from the State Water Project is affordable, even with construction of the single-tunnel conveyance project. That's because past investments in the system have yielded that benefit. We must not turn our back on the past investments in this system. Instead we should acknowledge their value and make the additional investment toward modernization.
162	Gene Beley	The single tunnel concept is still a disaster train wreck in the making and a huge waste of state funds once again. The financial boondoggle of the choo choo train is a small example of what a financial disaster the single tunnel concept is for the state of California,
227	Franz Steiner	The loss of fish and wildlife, the incomes from commercial fishermen and potentially the farmers presently taking water as allowed under the present reclamation districts bylaws, are being ignored. In fact, the tunnel is looking like a net loss of income for northern California while increasing the fertility of the Westlands and making money for their farmers.

235	Tim Stroshane Restore the Delta	Large and complex new water facilities like dams, reservoirs, and water tunnels require long lead times and complicated schedules. Recently the Delta Conveyance Design and Construction Authority was informed that a new tunnel has currently a proposed completion date of 2035. It may seem smart and overdue that California needs to build new infrastructure projects like a Delta tunnel and new reservoir storage will all due haste. It's just that California has entered a new reality where droughts are expected to be hotter and last longer, and atmospheric river storms are likely to cause more flooding and greater risks to our state. What are the best uses of Californians' time, good will, public commitment to efficient use of water, and money? DCP cost was estimated in 2018 at about $11 billion. An inflation rate of 5 percent per year was factored into that budget. We have learned that construction costs have accelerated since 2018. Moreover, a new "unknown" that will have some effect on project planning, design, and construction is COVID-19 pandemic. What effect will the pandemic have on supply chains for such projects as DCP? The world economy is slowing dramatically due to the pandemic, so the U.S. and California governments have yet to enact at this writing some type of fiscal stimulus or response. No one knows how long the pandemic will remain dangerous to human societies, or whether such a large project as DCP will remain feasible and possible for public agencies once it passes. As the new DCP is still under design, costs for the project—including true mitigation costs—are not fixed. A recent technical report prepared for the Delta Conveyance Design Construction Authority (DCDCA) by construction engineers suggests that the tunnel should move further east as a means to reduce construction costs, rather than construct it under islands purchased by Metropolitan Water District (which are less accessible to highways, rail lines, and Port of Stockton facilities). Plus, a great deal of new infrastructure, such as new roads and rail spurs to supply tunnel construction, will have to be designed, permitted and built before tunnel work may begin, adding years to the project. The DCDCA believes that with permitting and supportive infrastructure creation—including roads, train depots, and barge landings—the project will take at least 23 years to complete. The report also asserts that tunnel planners should not count on reusing Delta soils that will be removed during construction for shoring up levees or the new forebay to be constructed around the existing pumps. (It is estimated that the DCP's volume of excavated soil materials will be 40 percent of the volume expected for California WaterFix.) Deep Delta soils contain legacy mercury, arsenic, and chromium-6 and are 17not considered safe for use near drinking water supplies. It will be costly to remove, safely transport, and store such soils without dirt becoming airborne or leaking into drinking water sources. Safe disposal of tunnel-excavated soils will also be a costly enterprise if not handled correctly because they risk devastating environmental health outcomes. [Letter includes link to California Dam Breach Inundation Maps]
265	Molly Culton Sierra Club of California	The EIR should analyze the economic costs and benefits of the single tunnel project, especially for those rate payers and cities south of the Delta who will see an increase in water rates due to tunnel operations.

274	Mariah Looney Restore the Delta	Local water projects from conservation and efficiency programs will make 15 to 18 jobs for every one million dollars spent; however, the proposed tunnel project will only make 4 to 8 jobs for every one million dollars spent, and these jobs will not offset the jobs lost in local agriculture, industry and commuter jobs.
292	Bruce Campbell	The jobs created by the project will also create 300 millions tons of mucky water. Where will that go and will it survive a 1,500, 500 or 1,000 year flood?
349	David Scatena	I am concerned about the economic impact to our area.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs.
407	David Ogilvie Wilson Farms	The scoping document doesn't mentioned anything about the economic impacts that the project will have on the Delta during construction and after. Being a new National Heritage area and a budding region for Ag Tourism, a project like this will almost assuredly have a negative economic impact. And this doesn't even include the obvious concern of increased salinity moving through the Delta effect irrigation water for farmers and the fragile ecosystem. But I'm sure that part will be covered in the EIR. My point is, all of the environmental impacts, because we are talking about the Delta, all of those have an economic impact as well and I don't see it being covered in the scoping document.
411	Anna Swenson	So what I would like to request is that you do a study of how: One, you would replace or compensate for this agrarian lifestyle. You have been here. These are all our wonderful neighbors. They have all been here for multi-generations. How will you compensate them for their loss of the way of life here? I would like to know how you're going to compensate people for degradation of their wells, degradation of air quality, degradation of the ability to pull their crops when they need to because the roads are clogged with trucks or barges that are coming up the river. And I have a feeling that if you actually did the math for that, you would realize that there would be no way to ever actually compensate these people for what they're actually going to lose.
436	Tom Wallace	There will be pile driving, and I spent a lot of my life working on piles -- listening to pile drivers and being involved in that business. Pile driving 24 hours a day probably, lowering the groundwater, and I hope you realize what you're doing to these communities along the river. You are literally destroying the communities. You're destroying people's lives, and that certainly should be part of your environmental impact. I just -- one of my sons just moved out of Clarksburg. He sold his house for about a million dollars. That property would be worthless, absolutely worthless during that 10 year or 20 year period. He couldn't -- his total investment in his property would be lost, and that's what you are doing to everybody in Clarksburg and further down the river. So I just want you to consider that.

492	Jacklyn Shaw	We do not need to displace generational families with temporary construction jobs and ignoring control agreements. San Joaquin County, arguably 2/3 of the Delta, produces over 100 -200 kinds of fresh produce to USA and the world. That means Agricultural industries and agri-tourism would be impacted
499	Jacklyn Shaw	Check with San Joaquin County Supervisors, sjcgov.org. Supervisors of Five Delta counties all have written that any tunnel, water exports, would be devastating (to health, agricultural economy, etc.).
515	Lisa Combs	Hundreds of jobs and livelihood will be taken away. There will be nothing for us. Our homes are going to go down in price. It's just going to be ridiculous. We're not going to be able to sell our homes. We're going to have a marsh in our backyard.
517	Dan Liveley	This project under estimates construction costs and environmental costs during construction. The actual construction of this project is going to be terrible environmental costs.
520	Tim McCabe	It is against the law for one community to take the other communities' resources for their benefit and devastate the community.
520	Tim McCabe	The projected cost is $12 billion but in reality it will be something like $79 billion. Who is going to pay for project overruns?
530	Kevin Romick Mayor, City of Oakley	The long-term benefits of this project are sketchy. Risks for our community include the loss of significant dollars associated with adverse economic impacts on marinas, fishing, tourism, farming and other related activities.
538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	My comments focus on two critical areas where DWR appears to be repeating their mistakes of their past despite the Newsom administration's stated intention of taking a fresh approach: 1) postponing financial feasibility and benefit-cost analysis to the end instead of the beginning

538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	This is hardly a controversial point for water infrastructure planning. Feasibility studies, which include financial plans informed by benefit-cost analysis at their core, are typically conducted in tandem with environmental impact reports for water infrastructure. This is common sense as financial considerations have important consequences for project design, sizing and how infrastructure is operated. If financial feasibility analysis and environmental impact analysis are not done together in an integrated fashion, it is the EIR that should follow after feasibility, because the EIR guidelines frequently refer to feasibility as a factor in the development and consideration of alternatives. DWR itself has stated this principle, "The most efficient way to prepare environmental documentation may be to initiate the process in the second half of the feasibility study process or immediately after the feasibility study is completed, when alternatives are clearly formulated and analyses and adequate information are available to informatively discuss the project and its impact and benefits to the stakeholders."(Guidance for a state-led feasibility study, page 26) However, DWR appears to be doing it backwards for the single-tunnel plan and risks repeating the mistakes of the WaterFix experience. The notice of preparation for single-tunnel delta conveyance doesn't mention that it will be doing feasibility or economic analysis, and in an accompanying FAQ document states that it will do this analysis after a preferred alternative has been selected. "There will be a cost estimate, as well as both a Benefit-Cost Analysis and a Financial Analysis, developed during the planning process. At this point, the NOP is a start of the environmental review, which focuses on the relative environmental impacts rather than economic issues. Cost analyses will come later in the process, after a preferred alternative has been selected"(Delta conveyance NOP Q&A question 17, page 4) Besides being in conflict with DWR's own description of best practices, what's wrong with doing with putting economics and finance at the end? The most obvious problem is that stakeholders and agencies, both proponents and opponents of the project, can waste enormous amounts of money and time analyzing an infeasible project.
542	Bruce Campbell	Not only should the DEIR seek to more accurately predict the length of time that it would take to complete the DCP tunnel and associated infrastructure, but it should also be a lot more frank about how much it would truly cost.
543	Greg Knoblich	The Central Corridor will result in huge economic losses to boating communities, marinas, and boating-based mom and po businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
544	Betty Miller	The Central Corridor will result in huge economic losses to boating communities, marinas, and boating-based mom and po businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
560	Bradford Pappalardo Steamboat Resort	Any elongated disruption to our guests due to the noise and traffic from tunnel construction will have a direct and devastating impact on the business' ability to survive for future generations to enjoy.

574	Philip Merlo San Joaquin Historical Society & Museum	To what extent does the DWR plan to forecast the economic impacts of the project on the logistics industries that rely on Delta agriculture? How will this project impact the strategic economic posture of the Cities of Stockton, Brentwood, Tracy, and Lathrop? How will this project impact the economic vitality of the Port of Stockton? Will the DWR forecast the long-term impacts on industries that ship products of the Delta?
612	Warren Bogle Reclamation District 150	Economic impacts include a reduction in the farming economy by installing infrastructure to mitigate for hydraulic impacts from the intakes that will remove agriculture from production.
623	Bob and Carolyn Graham	I am opposed to the proposed Central Corridor.
624	Gabrielle Tetreault	I am opposed to the proposed Central Corridor.
627	Nichelle Garcia	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs.
673	Jan Hagen	Third, Delta farmers will also have their livelihoods negatively affected.
677	Jeff McCormack JT McCormack, Inc..	Increased highway patrols by both the CHP and Sacramento County sheriff, and any other traffic control barriers or monitoring systems should also be costs attributed to the decline in the environment of our region as a result of this mega-project. Do not shrug off these costs onto other agencies' budgets. They all will have other competing demands, such as infrastructure to deal with sea level rise, flooding, pandemic, etc. Increased costs due to this project should not be paid for by the taxpayers of the state who are not benefitting from L.A.'s unmitigated growth in demand for water. Water profits from re-sale to other districts by L.A. Metropolitan Water District should be capped, like a public utility, to reduce the incentive for them to do a water grab from Northern California, like they did in the Owens Valley. Their willingness to cover the costs that Westlands refused to risk, saying that they would just sell it back to them later at a higher price, reveals that they are in it for the profits. Their investing in other projects to get water to re-sell at a profit for them creates environmental impacts all over the state from lost water use locally in those districts. Those impacts should be included as part of this EIR.
677	Jeff McCormack JT McCormack, Inc.	However, any removal of water during drought years in this water allocation regime which is already 5 times over the capacity of the river, would have unacceptable environmental, social and economic impacts on our ranches and communities.

697	Delta Independent Science Board	Comments on WaterFix Final EIR/EIS to consider in Delta Conveyance EIR: A response to point 3 refers us to the response to 2546-66, which is: "Please refer to Section 30.3.4.1, Agricultural Contractor Export Service Areas, Chapter 30, of this Final EIR/EIS. This section describes potential indirect effects of reductions in SWP and CVP deliveries to Export Service Areas resulting from implementation of the project, including increases in cost of water, using empirical evidence from past behavior of agricultural and M&I contractors to increases in cost of water. The issue of crops and water use is beyond the scope of the proposed project. For more information please refer to the updated California Water Plan's strategy for agricultural water use efficiency, which describes the use and application of scientific processes to control agricultural water delivery and use."(Italics added for emphasis) The response cited above directs us to section (30.3.4.1) which addresses the economic impacts of not having as much water as "before Delta environmental restrictions," but never addresses the environmental benefits (if any) of not having water, i.e., the environmental costs of having more. The next section (30.3.4.2) on municipal and industrial water use discusses how water agencies would adjust to lower supplies without the project in accordance with how they managed during the drought. The report does not address potential environmental benefits and costs arising from less urban water supplies. The benefit-cost analysis finds economic benefits from the delivery of water that would not otherwise have been delivered due to Delta environmental constraints, while the EIR/EIS argues that there are no environmental impacts because this is water that would have been delivered anyway. The economic and environmental analyses are not using the same baseline. More generally, the impacts, particularly of project construction, on Delta residents and visitors are substantively addressed, but not presented in a coherent and understandable way. Such impacts are often well discussed in detail, but are scattered across a variety of chapters and un-summarized for informing local Delta decision-makers and those concerned with Delta residents and visitors.
698	Steve Lambert Butte County Board of Supervisors	An objective and robust cost/benefit analysis in the DCP EIR should be conducted.
704	Eric Jenks Wilbur-Ellis Company	Wilbur-Ellis has serious concerns about how the Project could impact the company's agricultural retail facility located at 4707 Twin Cities Road, in Elk Grove ("Elk Grove facility"). The Twin Cities facility is critical to the company's business. Furthermore, growers in the Delta region, as well as northern San Joaquin and southern Sacramento counties, depend on the products and services that Wilbur-Ellis provides at the Twin Cities facility.

711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Loss of irreplaceable farmland. Delta agricultural land is protected in perpetuity by the State for agriculture through The Delta Protection Act of 1992. The Act declared that the Delta is a natural resource of statewide, national, and international significance, containing irreplaceable resources, and that it is the policy of the State to recognize, preserve, and protect those resources of the Delta for the use and enjoyment of current and future generations, in a manner that protects and enhances the unique values of the Delta as an evolving place (PRC sections 29701-2).Specifically, it identifies agricultural lands located within the primary zone should be protected from the intrusion of nonagricultural uses (PRC sections 29703-c).More than 80% of Delta farmland is classified Prime by the USDA, the richest soil in the State. Agriculture was the reason for the Delta's original reclamation and remains the predominant land use in the primary zone. The Delta Protection Commission is tasked to conserve agricultural land and economically sustainable agricultural operations in the Delta through its Land Use and Resource Management Plan. This Delta Conveyance Project will ruin thousands of acres of prime farmland during the construction. These impact areas include the tunnel shafts construction zones, the intermediate forebay, dewatering zones, and temporary roadways. The tunnel shafts would destroy over 2,800 to 3,200 acres alone. Even though the construction will end, the impact from soil compaction, oil and fuel contamination, tunnel muck contamination, temporary paved haul roads, and more will permanently alter and prevent the ability to farm that piece of land forever. In addition, as flows decrease in the Sacramento River, saltwater will quickly creep farther upriver all the way to the City of Sacramento. This increase salinity will contaminant all the Delta's prime farmland and destroy the agricultural production that sustains these Delta communities and California. We request that the EIR include economic impacts from the permanent destruction of several hundred thousand acres of agricultural land in the Delta.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Tunnel construction is a specialized job that will require specialized workers. Those workers are not in California, so saying that this project will create jobs for Californians is not correct. Already, the state has hired an out-of-state lead engineer to oversee this project. Just like a few years ago when the State spent $3 million to repaint the 3 bridges along Highway 160, they took low bid which was a company from Washington State who brought down their own workers from Washington. All that money all went back to Washington State's economy, not California's. We request the EIR to assess the reinvestment of CA taxpayer's money to be paid to the potential tunnel construction companies already identified as able to build the tunnel and including the lead engineer.

718	David Strecker San Joaquin Farm Bureau Federation	Loss of irreplaceable farmland. Delta agricultural land is protected in perpetuity by the State for agriculture through The Delta Protection Act of 1992. The Act declared that the Delta is a natural resource of statewide, national, and international significance, containing irreplaceable resources, and that it is the policy of the State to recognize, preserve, and protect those resources of the Delta for the use and enjoyment of current and future generations, in a manner that protects and enhances the unique values of the Delta as an evolving place (PRC sections 29701-2).Specifically, it identifies agricultural lands located within the primary zone should be protected from the intrusion of nonagricultural uses (PRC sections 29703-c).More than 80% of Delta farmland is classified Prime by the USDA, the richest soil in the State. Agriculture was the reason for the Delta's original reclamation and remains the predominant land use in the primary zone. The Delta Protection Commission is tasked to conserve agricultural land and economically sustainable agricultural operations in the Delta through its Land Use and Resource Management Plan. This Delta Conveyance Project will ruin thousands of acres of prime farmland during the construction. These impact areas include the tunnel shafts construction zones, the intermediate forebay, dewatering zones, and temporary roadways. The tunnel shafts would destroy over 2,800 to 3,200 acres alone. Even though the construction will end, the impact from soil compaction, oil and fuel contamination, tunnel muck contamination, temporary paved haul roads, and more will permanently alter and prevent the ability to farm that piece of land forever. In addition, as flows decrease in the Sacramento River, saltwater will quickly creep farther upriver all the way to the City of Sacramento. This increase salinity will contaminant all the Delta's prime farmland and destroy the agricultural production that sustains these Delta communities and California. We request that the EIR include economic impacts from the permanent destruction of several hundred thousand acres of agricultural land in the Delta.
718	David Strecker San Joaquin Farm Bureau Federation	Tunnel construction is a specialized job that will require specialized workers. Those workers are not in California, so saying that this project will create jobs for Californians is not correct. Already, the state has hired an out-of-state lead engineer to oversee this project. Just like a few years ago when the State spent $3 million to repaint the 3 bridges along Highway 160, they took low bid which was a company from Washington State who brought down their own workers from Washington. All that money all went back to Washington State's economy, not California's. We request the EIR to assess the reinvestment of CA taxpayer's money to be paid to the potential tunnel construction companies already identified as able to build the tunnel and including the lead engineer.

730	Reclamation District 551	The Delta Conveyance Project would potentially remove a substantial portion of District land from local ownership, likely interfering with the District's primary funding mechanisms. Historically, some State agencies have resisted paying local assessments, despite the constitutional mandate to make payments in proportion to the benefits received from the funded services. (Cal. Const. Art. XIII D, § 4(a).) Any interruption or reduction in funding to RD 551 would necessarily cause an adverse impact on local drainage and flood protection, and therefore would be considered a significant environmental impact under CEQA. Were the Federal government to own any portion of the property within Pearson District, RD 551 would be unable to collect assessments without a waiver of sovereign immunity. The Delta Conveyance Project would also need to ensure a permanent funding mechanism to make up this portion of RD 551's annual assessment.
730	Reclamation District 551	The Delta Conveyance Project has the potential to permanently alter the District's current land uses, and to impose unacceptable environmental and economic impacts on the agricultural lands that make up the overwhelming majority of the District's assessment base.
730	Reclamation District 551	The Draft EIR must analyze the economic, social and health effects of constructing and operating the Delta Conveyance Project facilities within the Pearson District, including the devastating effect upon the local economy and the severe impacts upon the community of people who live and work in the district. These effects on the human environment must be, at a minimum, mitigated to the extent required under controlling law.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must analyze whether, and how or how-not, the Project will cause a decline in property values in the District, the Clarksburg community, and the North Delta.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must analyze whether, and how or how-not, the Project will cause blight and property abandonment.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must analyze whether, and how or how-not, the Project will cause a decline in property values in the District, the Clarksburg community, and the North Delta.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must analyze whether, and how or how-not, the Project will cause blight and property abandonment.
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Financial impacts to RDs in the Plan Area (e.g., reduced assessment revenues during the 10-year construction, increased maintenance costs to deal with seepage/erosion damage, increased drainage pumping costs);

783	Mark Miyoshi Winnemem Wintu Tribe	Finally, corporate profits must NEVER supersede the Public Trust doctrine. Water must never be sold for profit. This EIR must include a transparent and thorough analysis of the economic benefits and a listing of economic beneficiaries of the Project as compared to the environmental costs to nature and natural systems and the monetary costs placed on the backs of citizens.
791	Arabella Merlo	The EIR must consider hidden costs to the landowners through disruptions to farming, levee maintenance, damage to ground levels due to soils, damage to ground water, affects of construction, pollution and possible new regulations due to poor water and air quality (i.e. fish screens, etc.). The EIR must consider the effect to Reclamation Districts, which on the backs of landowners have to maintain levees and provide drainage.
805	Ashwani K. Rana	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
809	Martin Freitas	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
822	Karen Coffee	The impacts on the continued and future growth and well-being of the Residents including me, and including the impacts of any de-population in the Clarksburg Community and the North Delta, which could impact the economy of this area, as a result of the construction, operations, and management of the Project.
822	Karen Coffee	Whether, and how or how-not, the Project will cause a decline in Residents and each of the Residents property values in the Clarksburg Community and the North Delta. Whether, and how or how-not, the Project will cause blight and property abandonment in the Clarksburg Community and North Delta. Whether the Project will invest in public facilities and infrastructure throughout the Clarksburg Community and North Delta to mitigate the impacts of the Project.
853	Susan Alexander	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a “no tunnel” alternative and investment in water conservation and efficiency improvements to meet water supply needs.

859	Anita Jennings	My name is Anita Jennings. I'm calling because I'm very concerned about what's gonna happen. I really feel that with our honest and knowledgeable input, our fisheries are doomed. Little by little they will perish but not obviously you will imply that they're being cared for, just as you're going to protect the wetlands which is really doubtful. It doesn't fit in to big Ag, and it doesn't fit in to westland development and it doesn't fit in to our current federal administration which is only interested in money and power and I'm really afraid that damage will be done to the whole estuary and after it's all done and at an incredible financial cost, we're gonna say "uh oh, this isn't gonna work, look at what we should have done differently". I know it's been a long term project to put the interest or the environmentalists really hasn't been listening to. I think basically nobody really cares about the environment at all. We're just a society totally focused on financial gain and big Ag is doing fine, they don't need more water. We don't need more almonds. What we need are more salmon and more smelt. This is an incredibly valuable industry and nobody's really looking at it seriously. Thank you.
880	Muriel Strand	5. How will this project affect the Bay-Delta economy and residents, now and in the future?
884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - Central Corridor impacts on boating & recreation and resulting economic loss to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages. How are we going to enjoy our current un mitigated use of the waterways around the delta during construction? I see no details in the plan showing how navigational routes will not be effected by construction marine traffic, the blocking of waterways and mooring(s) blocking use of navigable waterways for years!
884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - Impacts on Delta farmers.
889	Todd Scruggs	Impacts on Delta farmers.
891	Alice Neuhauser	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs. For ratepayers in Southern California, it is important that you have comparisons to a no-tunnel option in terms of financing.
895	Jorge De Cecco	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft: Central Corridor impacts on boating & recreation and resulting economic loss to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft: Impacts negative on Delta farmers.

907	Linda Hall	The delta ecosystem, local farmers and business will not survive.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Central Corridor impacts on boating & recreation and resulting economic loss to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Impacts on Delta farmers.
949	Michael Harris	I expect you to consider the proposed tunnels potential negative effects on all endangered and threatened species, on all commercial and sport fishing, on bay and delta estuaries systems, on salt water intrusion, on delta farms and farmers, on recreational boating, shipping, and on delta communities. I also expect you to consider whether any delta water should go to continue to help wealthy people to farm marginal farmland in the southern central valley. All of the potential negative effects of removing any more water from the delta overpoweringly militate against directing more delta water to such marginal farmland as those serviced by the Westlands Irrigation District other such southern Central Valley irrigation districts.
955	Donna Bramble	Third, Delta farmers will also have their livelihoods negatively affected.
956	Betty Miller	Third, Delta farmers will also have their livelihoods negatively affected.
957	Martin Freitas	Third, Delta farmers will also have their livelihoods negatively affected.
959	Sandra Hagerty	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages. Please do not move forward with this plan.
959	Sandra Hagerty	Third, Delta farmers will also have their livelihoods negatively affected.
960	John Hoffman	I am writing today to express my opposition to the proposed Central Corridor. My reasons for this are as follows. First, it will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages. Please do not move forward with this plan.
960	John Hoffman	Third, Delta farmers will also have their livelihoods negatively affected.
973	Laurie Yglesia	New impacts to Discovery Bay from the new, closer shaft. - Central Corridor impacts on boating & recreation and resulting economic loss to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.

905, 906	Mark & Linda Lambert	1). Specifically, the central Corridor impacts on boating & recreation and resulting economic loss to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
905, 906	Mark & Linda Lambert	3). Impacts on Delta farmers.
973	Laurie Yglesia	- Impacts on Delta farmers.
1004	Blythe Reis and Mark DuPont	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a “no tunnel” alternative and investment in water conservation and efficiency improvements to meet water supply needs.

Table D-12. Comments Community Benefits

Letter	Commenter Name, Affiliation	Comment Text
143	Paul Anderson	There must be a plan to ensure that the Delta infrastructure will not only be preserved but improved.
152	Patrick Nolan	There must be a plan to ensure that the Delta infrastructure will not only be preserved but improved.
157	Julie Fouquet	Any water plan should ensure that both salmonid populations and the Delta infrastructure will not only be preserved, but also improved.
165	David Mackler	Please make all efforts to ensure that our Delta infrastructure will not only be preserved but improved.
325	Bill Wells California Delta Chamber and Visitor's Bureau	I'd like to direct your attention to your own documents down here. Item number two, the last sentence says, "The infrastructure that enables the conveyance or movement of California's water supply is critical to the health of local communities." I totally agree. It's critical to Stockton, Isleton, Walnut Grove and all of the other little towns on to the Sacramento River. So I think protecting that would be a very -- very good thing to do.
342	Darius Waiters	Tunnels take so much from my community. Youth from schools and the prisons, fathers into jails are familiar resources and welfare, our hope for a brighter future.
505	Lenora Clark	Recreational Boaters has seen the absence of a plan to ensure that the Delta's infrastructure will not only be preserved but improved,
512	Mike Guzzaroo	We came because this is a beautiful heritage that our families and friends are enjoying and generations of people have lived and got their livelihood and their families on the Delta. There is no place like this place anyplace in the world, and we shouldn't do this dangerous project. We should be looking at the alternatives.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, the Project will benefit the Residents, each of the Residents, the Clarksburg Community, any significant part of the Clarksburg Community, and North Delta.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, the Project will enhance and protect the Residents, each of the Residents, the Clarksburg Community, each significant part of the Clarksburg Community, and the North Delta (Public Resource Code § 85054). -
731	Mark Pruner Clarksburg Fire Protection District	EIR must fully analyze whether, and how or how-not, the Project will benefit the District, the Mission of Clarksburg Fire, the Clarksburg Community, and the North Delta.
732	Friends of the 1883 Clarksburg Schoolhouse	EIR must fully analyze whether, and how or how-not, the Project will benefit the Clarksburg Community, and the North Delta.

Table D-13. Comments Regarding Alternatives

Letter	Commenter Name, Affiliation	Comment Text
7	Michael Greggans	A CEQA study to bring ocean water by pipeline to desalination plants built in the south land will result in showing a yield of far less impact to the environment than taking another drop of water from the Delta. With an unlimited supply of water in the Pacific, as opposed to already overtaxed Delta water removal.
7	Michael Greggans	With Southern California's continual growth, and wealthy Central Valley farmers growing more crops, the demand for water will never decrease. The Delta is not the place to take any more water. Think about the future, and not a temporary fix that will be obsolete in less than a generation because of increased demand.
9	David Pedersen, General Manager, Las Virgenes Municipal Water District	LVMWD strongly supports the proposed project alternative for delta conveyance that consists of a single tunnel to convey 6,000 cubic-feet per-second (cfs). While it is appropriate for the environmental process to examine a range of alternatives, previous analyses have shown that a smaller facility would not proportionately reduce costs, as compared to benefits, because high stormwater flows could not be captured. It is very important that the proposed alternatives are cost-effective for the beneficiary agencies that will be expected to fund the project. A 6,000 cfs facility has the greatest possibility of accomplishing this need. Further, it would not be fruitful to evaluate lower-capacity alternatives as they would not be economically viable for the project beneficiaries. A 6,000 cfs single-tunnel facility would require two intakes in the northern Delta. It would be most appropriate to examine the three intake locations that were previously fully vetted through the California WaterFix process. These locations were carefully identified to minimize impacts to migrating fisheries and nearby Delta communities, while taking into account potential sea level rise. LVMWD also supports examination of the two corridors for the tunnel facility: a "central" route similar to that investigated through the California WaterFix process and an "eastern" route closer to Interstate 5. Fully examining these two alternatives stands great promise in identifying a route that minimizes impacts and identifies "win-win" benefits to the Delta region.
10	Jim Blickenstaff, Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	3] This gets us to Alternatives. Assuming an accurate CEQA accounting of all the negative consequences for the Delta ecosystem and the surrounding dependent economic/environmental systems, the full array of all viable alternatives will need to be evaluated and compared with the negative impacts – environmental and economic – borne by the Delta Region from all phases of this tunnel plan. Typically Alternatives have, to one degree or another, been superficially looked at, and 'spun,' to give an apparent advantage to the Lead Plan. That would be a serious mistake in this most serious process -- especially in the context of a Lead Plan demonstrating a stunning lack of vision, and decades out of touch with today and tomorrow's water and climate realities. Here are two Viable Alternatives that require detailed study: One: State of the art desalination plants in Southern California. (Some scenarios could even involve utilization of the Salton Sea) Good news: In the coming decades, as Northern California fresh water becomes more scarce, more unpredictable, and generally problematic, sea water will become ever more plentiful – and diluted. One question that will need to be answered is: For an initial expenditure comparable to the $14billion to $20billion cost for a Delta tunnel conveyance, what do you get short term, but especially long term, in desalination derived fresh water? Two: In conjunction with implementing non-depletion alternatives, a

		"conveyance system" including natural drainage augmentations specifically designed to bring MORE fresh water into the Delta. This is contingent, of course, on California Leadership's depth of commitment to actually "....saving the Delta."* Sadly, recent actions by our Governor clearly make such a commitment remote, at best.
12	Diane Kirkham	Expand the NOP to include analysis of Little Sip, Big Gulp. The NOP is deficient in that it fails to examine legitimate and feasible alternatives. Specifically, I recommend that the NOP and EIR be expanded to include a serious and fair minded analysis of Congressman Garamendi's alternative proposal, called the Little Sip, Big gulp alternative.
12	Diane Kirkham	Delete the Eastern Corridor from consideration in the NOP. The current NOP proposes to study two alternative corridors for the main tunnel: the Central Tunnel Corridor and the Eastern Tunnel Corridor. The Central Tunnel Corridor is similar to he tunnel alignment designated in the final EIR for the Twin Tunnels project. I believe that the Central Corridor is far preferable to the Eastern Corridor because it utilizes a number of publicly owned properties for a substantial share of its alignment, thereby avoiding protracted and disruptive acquisition delays associated with acquisition of private properties. The Central corridor would go through Bacon and Bouldin Islands, both owned by the Metropolitan Water District. In addition, the Central corridor also would go through the McCormack Williamson Tract which was recently acquired by the Department of Water Resources. And finally, the Central Corridor also would go through Staten Island, currently owned by the Nature Conservancy but acquired with $35 million in public funds granted to the Nature Conservancy by DWR. It would be far superior to choose a tunnel path that takes advantage of these lands already publicly owned or funded by public resources rather than to disrupt the private property owners and the largely agricultural pursuits within the Eastern corridor.
12	Diane Kirkham	I believe that this Delta Conveyance Single Tunnel proposal has dire consequences for the Delta, its water quality, its plant and animal life and its citizens. Please make every effort to make your analysis a fair and reasonable examination of the alternatives.
17	Leland Frayseth	After all the costs and risks are dialed in desalinization at point of use in Southern California may be a very attractive alternative.
19	Monique Sonoquie	At the scoping meeting in Sacramento you discussed using innovative new technologies. Please look into this proven innovative alternative energy project. Also as i stated in my comments. I don't think you would need any tunnels if you updated the old delta by capping it to stop evaporation and installed solar panels on the caps, and installed this micro hydro system (attachment). Also by using innovative dry or hydroponic farming methods, we could save a lot of ag water and decrease a significant amount of waste and pollution. The letter also includes the news article, Portland's New Pipes Harvest power from Drinking Water by alecope88 published on January 28, 2015 in Positive News.
22	Tamarin Austin	Please consider as a project alternative a series of recycled water projects, storm water capture, aquifer storage and desalinization that convey the same number of acre feet as the Delta Conveyance Project. To be clear, my suggestion is NOT a "no project" alternative, but rather a solution that focuses on the individual resources of each watershed that would otherwise take water from the Delta Conveyance Project. This

		alternative strengthens watershed independence and lessens reliance on water from the Sacramento Delta, thus improving the ecosystem for endangered species and their habitat.
29	Hope Salzer	The tunnel environmental impact report (EIR) should consider the following: Foremost, the EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a No-Tunnel alternative which would analyze water use efficiency, conservation, and incremental demand reduction measures that would be less environmentally harmful than the tunnel and achieve acceptable water supply reliability goals and targets.
29	Hope Salzer	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs. For ratepayers in Southern California, it is important that you have comparisons to a no-tunnel option in terms of financing.
48	Libby Lucas	Request you also address these specific areas of concern: - CEQA demands alternatives, so please consider elevated conveyance or aqueduct diverting flows at shipping channel bypass
58	Nina Jazmadarin Foothill Municipal Water District	Overall, I support the proposed project alternative for delta conveyance, one tunnel, sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project (SWP) agencies such as the Metropolitan Water District of Southern California. While it is appropriate for the environmental process to examine a range of sizes, previous analyses have shown that smaller facilities do not proportionately reduce costs as opportunities to sufficiently capture high stormwater flows cannot be achieved. Further, the proposed project and alternatives being evaluated should be "cost effective", meaning that they must make economic sense for the PW As that will be funding all of the costs. We believe a 6,000 cfs facility has the greatest possibility of accomplishing this need. I understand that the costs as compared to proportion of benefits goes up sharply as the capacity is reduced significantly below 6,000 cfs. Therefore the EIR should not evaluate alternative capacities that the PWA investors would have no interest in funding because the economic benefits and cost effectiveness does not exist.
58	Nina Jazmadarin Foothill Municipal Water District	A 6,000 CFS tunnel facility would require two intakes in the northern Delta. I support examining the three possible intake locations that had been fully vetted during the previous California Water Fix planning process. These locations were carefully identified to minimize impacts to migrating fisheries and nearby Delta communities while taking into account potential sea level rise.
58	Nina Jazmadarin Foothill Municipal Water District	I also support the two corridors to be examined for the tunnel facility, a "central" route similar to that of California WaterFix and an "eastern" route closer to Interstate 5. Fully examining these two alternatives stands great promise in identifying an ultimate route that minimizes impacts and hopefully identifies "win-win" benefits to the Delta region.
65	David F. Scatena	I propose a radical but practical solution to the conveyance and pumps! Shut down all the pumps from Tracy to San Diego! Redirect that electricity + dollars from the Metropolitan Water District & Westlands Irrigation District to build and operate Desalinization Plants along the coast! Consideration should be given to develop and implement a plan to capture the water that flows out the ocean through the Los Angeles River. All that water could be used for irrigation etc.! Result: This will increase the amount of water the

		State of California has available for use and distribution also will help reduce the rising sea level of the Pacific Ocean, plus it protects the Delta and S.F. Bay estuaries and their tributaries! It protects valuable farm land, the water quality, reduces pollution of air & water. This plan meets so many of the objectives of the conveyance plan it is a winner all around!!! Spend State of California Taxpayer $ to develop and enhance water conservation techniques with strict regulation of their implementation and use!
80	Dante John Nomellini Sr. Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113 and 2117	1) It is requested that the CEQA analysis include an independent and unbiased examination of all reasonable alternatives which would not include any tunnel and utilize the existing Delta channels for continued conveyance of water to the export pumps without interference with the customary district actions of the past. We recognize that the Governor predetermined that a single tunnel be included however we contend that such predetermination is contrary to law.
80	Dante John Nomellini Sr. Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113 and 2117	2) It is requested that the CEQA analysis include an independent and unbiased examination of all reasonable alternatives and alignments that avoid any action impacting the Reclamation works of these Districts.
80	Dante John Nomellini Sr. Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113 and 2117	3) It is requested that the CEQA analysis include an independent and unbiased examination of all reasonable alternatives that avoid any interference with the District operations.
80	Dante John Nomellini Sr. Reclamation Districts 548, 404, 684, 2023, 2024, 2027, 2037, 2038, 2039, 2040, 2041, 2065, 2072, 2113 and 2117	4) It is requested that the CEQA analysis include an independent and unbiased examination of all reasonable alternatives that would improve and enhance agricultural values in the Delta including those within the above Districts that support the assessment revenues necessary for the Districts to properly operate and maintain their reclamation works without construction of a tunnel or other isolated conveyance facility.
85	Luis Portillo Inland Empire Economic Partnership	More than 30 percent of Southern California's water supply comes from the Sierra Nevada and it provides the backbone water supply for millions of people, our $1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes.
87	Jaclyn Shaw	We are horrified to see the corridor map with mileage, for west of Lodi. I am born and raised, 7-12 miles from the "empty tunnel" plan, a taxing boondoggle for water bonds and expensive concrete. Even West of the Delta River, near the ship canal, is less invasive to generational families in agricultural tourism and

		industries. We appreciate statements of elected county supervisors in five Delta counties. Do you? We have increasing tax, without representation. . . I have attended meetings for five years. We see endless meetings and paperwork. These are issues and suggestions.
87	Jaclyn Shaw	(1) DROUGHT CYCLES or Desalination? Do SoCal and South Central Valley, and the Feds realize, plans would further dry Delta areas, in critical overdraft? They need desalination now, now later.
90	Jeri Opalk	I am writing to you today to urge you to please not go forward with any water plan that hurts wildlife and nature. Humans can and should recycle and conserve water instead of continually decimating nature.
97	Thomas Love Upper San Gabriel Valley Municipal Water District	Overall, I support the proposed project alternative for delta conveyance, one tunnel, sized to convey 6,000 cubic feet- per-second of water supply for the State Water Project (SWP) agencies such as the Metropolitan Water District of Southern California. While it is appropriate for the environmental process to examine a range of sizes, previous analyses have shown that smaller facilities do not proportionately reduce costs as opportunities to sufficiently capture high stormwater flows cannot be achieved. Further, the proposed project and alternatives being evaluated should be "cost effective", meaning that they must make economic sense for the PWAs that will be funding all of the costs. We believe a 6000 cfs facility has the greatest possibility of accomplishing this need. I understand that the costs as compared to proportion of benefits goes up sharply as the capacity is reduced significantly below 6000 cfs. Therefore, the EIR should not evaluate alternative capacities that the PWA investors would have no interest in funding because the economic benefits and cost effectiveness does not exist. A 6,000 CFS tunnel facility would require two intakes in the northern Delta. I support examining the three possible intake locations that had been fully vetted during the previous California WaterFix planning process. These locations were carefully identified to minimize impacts to migrating fisheries and nearby Delta communities while considering potential sea level rise. I also support the two corridors to be examined for the tunnel facility, a "central" route similar to that of California WaterFix and an "eastern" route closer to Interstate 5. Fully examining these two alternatives stands great promise in identifying an ultimate route that minimizes impacts and hopefully identifies "win-win" benefits to the Delta region.
98	Nikola Lakic Geothermal Worldwide, Inc.	I am the author of the proposal for the long-term solution for the restoration of the Salton Sea that includes an architectural design which incorporates several breakthroughs technologies in the energy industry which I have invented and modified to incorporate local conditions of the Salton Sea area. One of the breakthrough technologies is a system for importing seawater into the Salton Sea by using a special pipeline. Since there is no plan that I could study and because at the moment I am busy dealing with some deadline that I have to take care of, I am sending you summaries of my proposal for the restoration of the Salton Sea divided into five segments for better understanding. Two segments (pipeline system and solar system) are relevant to the Delta Conveyance project. With minor modifications, my pipeline system can be adapted to the Delta Conveyance project.
98	Nikola Lakic Geothermal Worldwide, Inc.	The pipeline is a better solution than the canal because water from the Sacramento River can be transported to the longer distance to farmlands without losing water through evaporation and leakage. It is my understanding from the video (Meeting Live Streaming) on December 11, 2019, that a tunnel for water to pass through is in a plan. I also heard concerns of some participants that in such case water will be

		polluted with mercury. Such pollution can be avoided by implementing the pipeline system. Even if the tunnel is built, the pipeline through the tunnel could be installed. Also, my pipeline system generates electricity on downhill routes. Also, the pipeline can be used as a foundation for solar panels (my design) and more electricity can be generated. Also, my system can be used to overcome some elevations and avoid building an expensive tunnel. My system (cross-country pipelines) have the "in line pump" as segments of the pipeline for uphill routes and have the "in-line generator" as segments of the pipeline for downhill routes. Also, my system is more efficient and less expensive than conventional pumping stations.
98	Nikola Lakic Geothermal Worldwide, Inc.	My proposal for the restoration of the Salton Sea involves architectural design which incorporates several breakthrough technologies in the energy industry which I have invented and modified to incorporate local conditions of the Salton Sea area with the final product – the long-term solution for the restoration of the Salton Sea. It might be considered as a project of the century costing only about $10 billion. At this point, I will just mention the subjects of my breakthrough methodologies: 1. I am the inventor of the new system for harnessing geothermal energy (completely closed-loop system) which is not limited to geothermal reservoirs. 2. I am also the inventor of the new system for drilling deeper and wider wellbores. 3. I am also the inventor of the new system for harnessing solar energy (thermo optical solar system) having power unite with pistons, which is at least several times more efficient than Photo Voltaic (PV) systems. 4. I am also the inventor of the new system of the cross-country pipelines for importing seawater or other fluids, having the "in-line-pump" as segments of the pipeline for uphill routes, and having the "in-line generator" as segments of the pipeline for downhill routes. 5. I am also the inventor of the new system for using the pipeline as a foundation for solar panels which eliminates expenses for purchasing or leasing huge sections of land, which is an expensive requirement for conventional solar facilities on an industrial scale. 6. I am also the inventor of the new system for desalinization of the salty water using solar and/or geothermal energy to generate electricity and having potable water as a free byproduct. My mission is global – which is licensing technologies to capable companies (contractors) with means. The Salton Sea project is a small part of it but an important part. It is imperative to save the Salton Sea and our environment despite unreasonable opposition. My proposal (system) desalinates the Lake, generates electricity, generates potable water and brine which can be used as a source for extraction of lithium. I am providing a solution and the "know-how" to the desperate situation. Here is the link to the video of complete presentation – it is about 1:00 hour: https://youtu.be/pcYTUPCiljQ. The video is not of the best quality, but it summarizes in one hour my work of the last dozen years. Included are several options including several different corridors. For more details, please read the papers. The papers and slides, which can be zoomed in, are accessible on my website: www.GeothermalWorldwide.com => "Our Technology" => "Presentation – CNRA – El Centro, CA". I am including, as an attachment, a summary of my proposal for the restoration of the Salton Sea, divided into five segments for easier understanding. Each of the segments (phases) is essential for the final result. Also, I am including my short biography. The value of my work is the simplicity of it and the necessity for it. An average high school student could understand it in a relatively short time if read thoroughly. My work is patented with several "continuation-in-part" applications still pending. [Attachment contains a white paper authored by the commenter titled, Harnessing Energy and Water in the Salton Sea (Segment I) (System for Importing Seawater)]

99	Paul Theiss	I support the general outlines of the single tunnel Delta Conveyance Project. Without being an expert on all the issues involved, it is obvious to me that the current state of affairs is unsustainable for a number of reasons, including: the Delta environment continues to decline due to pumping from the south end which interrupts normal flows; sea level rise imperils water quality; a major earthquake could breach levees and take out the whole system the political and economic clout of Valley farmers and Southern California residents ensures that the California Aqueduct will continue to be used, regardless of environmental damage to the Delta. Legal safeguards against excessive tunnel flows can be extended or strengthened. Withdrawing water upstream and pumping it south is not the ideal solution to the Delta's problems. But let's not allow the best to be the enemy of the good. A single tunnel with reduced flows from the original proposal is the most sustainable option available.
110	Sue Higgins	The water should come from the 2 abandon water distilleries in Pittsburgh CA distill water and send it south this would not effect our delta. And the gov can have a pipeline to bring it south.
112	Ron Van Horne	Why not more desalination in the southern California area?
115	Susan Simpson	Better to create water storage reservoirs than flood control reservoirs. Better to prohibit Big Ag from growing thirsty crops like almonds and pistachios. We have no business growing things like almonds in a region like the Central Valley. Better to have controlled real estate growth, like other states. No plan for water, no building permits.
117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] 2. The EIR/EIS does not include consideration of alternatives which better address the stated objectives, purpose and need and does not even seriously evaluate a No Action Alternative. With the exception of Alternative 9, the current EIR/EIS evaluates only variations on the common theme of adding an isolated conveyance from the North Delta to the existing export facilities in the South Delta. The reason for this is clear – the proposed project is driven by the desire of the Metropolitan Water District of Southern California for better quality water to blend with their salty Colorado River supplies coupled with the ire of the Westlands Water District at exports from the South Bay facilities sometimes being limited by arbitrary limits on the take of Delta smelt. But, as aggravating as those arbitrary limits might be to the westside farmers, their prospects are much more limited by the fact that they are farming in the rain shadow of the Coast ranges and, absent the past inflated and illegal diversions from the Trinity River and the lack of development of other diversions from the Northern Rivers, there is insufficient water available in the CVP for them to survive in dry years without pumping the groundwater ever lower. If the stated objectives, purpose and need of the BDCP are to be achieved, a much more serious study of alternatives is required, not just to demonstrate that the preferred alternative is superior to other alternatives but to find one or more alternatives that actually provide water supply reliability, restore the Delta ecosystem, and improve water quality for both exporters and in-Delta users. Basically that requires developing one or more solutions that comply with the two principles delineated in the previous section. As noted above, no long-term plan to address California's water management issues can succeed unless the wide variation in precipitation from year to year is addressed. This creates a problem in discussion of possible alternatives to the BDCP because the BDCP does not really address this point and formal legal challenges to the BDCP EIR are limited to projects that include the same

		stated purposes as the BDCP. Thus, since the BDCP does not include any actions outside the Delta such as additional storage or measures to make existing water supplies go further such as conservation, recycling, stormwater capture and desalination, all of which are needed to better survive droughts, alternatives that rely on these measures do not necessarily constitute valid legal alternatives to the BDCP under CEQA. For instance, a "limited action alternative" that simply improves levees to further reduce seismic risk and reduces exports but compensates for that with increased funding for conservation, recycling, stormwater capture and desalination may not meet the legal test for being a valid alternative because the purpose of the BDCP is to provide reliable exports at around existing levels and to obtain incidental take permits to cover those exports. However, the claim that the BDCP consists of measures entirely within the Delta is fallacious since at least some re-operation of SWP and CVP reservoirs is likely to be necessary to meet bypass flow and Delta outflow requirements and restoration of the aqueducts in the San Joaquin Valley is likely necessary in order to convey as much as 14,400 cfs south from the Delta, as is proposed at present.
117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] Moreover, the 2009 Delta Reform Act sets the following as a basic goal of the State for the Delta: Achieve the two coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place; and it subsequently charges the Delta Stewardship Council to accept the BDCP in to the Delta Plan if, and only if, the BDCP has studied a reasonable range of conveyance alternatives, amongst other things. These are broader requirements than the self declared purposes of the BDCP and if the BDCP does not meet them, it cannot be included in the Delta Plan and it will otherwise be non-compliant with State law. Of the various alternatives that have been proposed to date in public, but not studied seriously as alternatives in the BDCP, there are two that do appear to satisfy the stated purposes of the BDCP and in varying degrees address the broader, longer-term problem. These alternatives can be thought of a minimum approach and a maximum approach to exporting surplus water from the Delta. Both assume that as economics dictate, growing use will be made of conservation, recycling, stormwater capture and desalination but they do not spell out the details of this. Both allow the construction of additional upstream and south-of-Delta surface storage, but do not specifically call for it. The "maximum" alternative, however, specifically calls for much increased groundwater storage obtained by using big gulps in wet year to recharge the groundwater basins in the San Joaquin Valley that are presently over drafted. The minimum approach would likely require significant retirement of irrigated lands in the San Joaquin Valley, but the maximum approach might not.
117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] The minimum approach would essentially be a valid "no action alternative" in terms of the BDCP. The present public draft of the BDCP EIR/EIS gives short shrift to the No Action Alternative. Indeed at the open house held in Walnut Grove on the public draft, BDCP consultants freely admitted that in the current draft the No Action Alternative is not evaluated in the same detail as other alternatives and, laughably, gave "space limitations" as an excuse for that! In Section 9.3.3.1 it is stated: The No Action Alternative assumptions also include projects and programs that are permitted or are assumed to be constructed by 2060. However then, in Section 9.3.3.1.1 the current draft says: Ongoing and reasonably foreseeable future projects in parts of the Delta are expected to upgrade the

		levees to a "flood-safe" condition under the 100-year return flood elevation. However, these projects would provide very little levee foundation strengthening and improvements directed at improving the stability of the levees to better withstand ground shaking, liquefaction, and slope instability. This language is purely political and does not reflect the reality that the Economic Sustainability Plan of the Delta Protection Commission recommends future improvement of most lowland Delta levees and other Delta levees that may be susceptible to damage resulting from liquefaction even though they meet the PL 84-99 standard to a new standard popularly called the "fat levee" standard. This has been widely discussed both in official meetings and in the press. It has been confirmed by recent improvements made on Jones Tract, as a result of outstanding cooperation between EBMUD, the local reclamation district, the DWR and CA Wildlife, that such "fat" levees can be constructed at the reasonable cost of $2-3 million per mile. Improvement of 600 miles of Delta levees to this standard would thus cost less than $2 billion, a small fraction of the estimated cost of the BDCP. The DWR, the Delta Stewardship Council and the DPC are currently collaborating on outlining legislation that would create a Delta Flood Risk Management District that will take over funding of such improvements once current bond funding has been exhausted. It can easily be projected that the Economic Sustainability Plan recommendation will be fully implemented by 2060. The "fat" levees recommended in the Economic Sustainability Plan are specifically designed to allow the planting of vegetation on their water side in order to provide shaded riparian habitat for various listed species. Further, if supplemented by additional conservation measures including measures that are already being planned such as those at Prospect Island and Dutch Slough, that are properly located, instead of being wrongly located as is the case with the BDCP5, what is still a no action alternative in terms of conveyance would be marginally capable of meeting the stated purposes of the BDCP in terms of CEQA and NEPA. Such a "no action alternative" would likely allow the SWP and CVP to deliver up to full contract amounts, when hydrologic conditions result in the availability of sufficient water (that is in wet years), although, as with the BDCP, full contract amounts would not be delivered in normal to dry years and no additional storage or groundwater recharge would be created in order to help the SWP and CVP Contractors survive periods of drought. This might force retirement of some irrigated acreage in the San Joaquin Valley or, at a minimum, necessitate restrictions on the planting of permanent crops. Under this minimum approach the pattern of flow through the Delta would still be unnatural and significant numbers of fish would still be caught in the "salvage facilities" in the South Delta and not survive subsequent transport and release, but such a conveyance alternative with appropriate operating rules, would still have a better chance of qualifying for HCP and NCCP status than the existing BDCP.
117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] The Maximum Approach would comply with the two principles enunciated above. The Western Delta Intakes Concept (WDIC) which is mislabeled as the "Pyke Proposal" and poorly described in Appendix 3A, Section 3A.11.4, serves as an example of an alternative conveyance and ecosystem restoration solution that complies with these principles. The WDIC is not necessarily the only solution that complies with these principles and a serious effort should be made both to seek other solutions that do and to develop them to the point that a valid comparison of alternatives can be made. This is required not only to satisfy the requirements of CEQA but more importantly to develop the optimum solution to the problems or needs that the BDCP is supposed to be

		addressing. No-one disputes that these problems or needs are real. But what is needed is a solution that actually addresses them, rather than 40,000 pages of mumbo jumbo which do not.
117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] A detailed response to the inaccurate description and evaluation of the WDIC that is included in the public draft EIR/EIS is attached at Appendix A to these comments and more detailed description and references can be found at http://fixCAwater.com. Briefly, the WDIC would relocate the principal point of diversion for exports from the South Delta to the West Delta. Water surplus to upstream and in-Delta needs and the Delta outflow required to sustain fisheries would be extracted through permeable embankments on Sherman Island that would constitute the world's largest fish screens. Because Sherman Island is located in an area of large tidal flows, the water extracted would only be a small fraction of the total flow at that point. The principle objective of this relocation would be to restore more natural flows through the Delta both in pattern and quantity in order to reverse the gradual conversion of the Delta from an estuary into a weedy lake choked by invasive plants, but it also has the merit of making the extraction of water for exports self-regulating, because any attempt to over-extract water would result in saline water being sucked into the pumps. Water extracted at Sherman Island would be transported to the Clifton Court Forebay in large tunnels, similar to those proposed in the BDCP, but half the length. The existing South Delta pumps would be retained both to lift water into the canals going south, but also to extract water directly from the Old River through new state-of-the-art fish screens on the very limited occasions when there are high flows in the San Joaquin and Old Rivers. When the South Delta pumps are extracting water from the Old River, water from Sherman Island that cannot not be moved south right away would be stored temporarily in a further enlarged Los Vaqueros Reservoir6 and/or a new Brushy Creek Reservoir. The objective or this rearrangement of conveyance facilities is to allow the extraction of as much as 30,000 cfs during the limited periods of high flows in the Sacramento and San Joaquin Rivers. Without such a rearrangement it will never be possible to extract enough water during periods of high flows to make up for the need to reduce or eliminate extraction during periods of low flows. In the absence of other longer-term solutions, water quality in the South Delta would be maintained by re-circulation as necessary from the export canals to the San Joaquin River. Again, the WDIC actually addresses the stated objectives, purpose and need of the BDCP whereas the BDCP does not. It was first outlined in an Op-Ed in the Contra Costa Times on Christmas Day, 2010. I subsequently met with Under Secretary Meral on May 11, 2011, and then with Secretary Laird and Under Secretary Meral on February 29, 2012. There was ample time after these meetings for the BDCP to conduct a proper evaluation of the WDIC, but that was not done. Apart from one phone call to chase down a reference, neither I nor the team that has worked on developing the WDIC have been approached by BDCP staff or consultants to discuss any aspect of the WDIC. As can be seen from my detailed responses in Appendix A, the evaluation that is included in the public draft EIR/EIS is ill-informed and incorrect. As has been correctly noted by the Delta Independent Science Board7 "the project (meaning the BDCP) is encumbered by uncertainties that are considered inconsistently and incompletely; modeling has not been used effectively to bracket a range of uncertainties or to explore how uncertainties may propagate." It will be true to some extent that there will be uncertainties involved in any solution to the water export reliability and ecosystem restoration problems facing the Delta, but the solution is not just better analysis

		but also to come up with robust solutions that show substantial improvements over the current conditions, rather than improvements which are at best marginal, as is the case with the BDCP. In summary, the current public draft of the EIR/EIS does not contain an adequate comparison of alternatives and is misleading and inaccurate in its description of the Western Delta Intakes Concept. A proper analysis of alternatives that will actually meet that stated objectives, purpose and need, including but not limited to the Western Delta Intakes Concept, must be performed and then a new draft EIR/EIS must be released for public review and comment.
117	Robert Pyke	[Attachment 2: Appendix A Response to Rejection of Western Delta Intakes Concept as a Comparable Project to the Bay Delta Conservation Plan in the BDCP Public Draft EIR/EIS] This attachment provides details regarding Western Delta Intakes Concept proposal in comparison to how it was characterized in the 2013 Draft BDCP EIR/EIS.
117	Robert Pyke	[Attachment 4: Addendum to Comments on the BDCP Public Draft EIR/EIS Dated May 26, 2014] Comment letter includes critique of the estimated export amounts included in the 2013 Draft BDCP EIR/EIS and the prospect of obtaining the necessary permits from the Army Corps of Engineers as well as the need for additional storage south of Delta to store water exported during high flow years.
117	Robert Pyke	[Attachment 5: A Self-Regulating, Inclusive and Sustainable Solution for the Sacramento San Joaquin Delta, December 17, 2012, Updated May 17, 2013] This attachment includes additional description of the Western Delta Intake Concept.
117	Robert Pyke	[Attachment 6: Addendum to "A Self-Regulating, Inclusive and Sustainable Solution for the Sacramento San Joaquin Delta, December 17, 2012" February 24, 2013, Updated May 8, 2013"] This attachment includes additional description of the Western Delta Intake Concept.
117	Robert Pyke	[Attachment 7: Water Conveyance, Ecosystem Restoration and Levee Issues in the Sacramento San Joaquin Delta Presentation] This attachment is a copy of a presentation on the Western Delta Intakes Concept.
120	Burt Milburn	In order to meet water usage demands in the far future, California needs to adopt policies now requiring each watershed area be self sustained and that coastal communities commit to using only local water sources and treated ocean water. Coastal communities should not be allowed to deplete inland water supplies.
123	Lauretta Aldridge	In regards to the Delta Conveyance Project, when looking at options, include all methods of conserving water, directing runoff to bioswales to regenerate ground water, water storage, desalination, and water efficiency in agriculture including growing crops that require less water. The Delta is a valuable resource which will change forever if too much fresh water is redirected south. Look at the research.
124	Carlin Black	Instead of letting sea level rise in the delta worry you about the aqueduct feed infrastructure. Which will also have disastrous effects on the salinity of delta water. Spend the multi billions in San Francisco building a cofferdam across the bay via Alcatraz to Marin. You could probably get BART to contribute by tunneling under Sausalito to Marin City and using the excavated material for the cofferdam. They would put their tunnels under the ship and tidal locks and otherwise build them roughly at 2010 sea level anticipating burying them when Thwaits Glacier collapses. This cofferdam will eliminate the need for sea walls all

		around the bay, and the tidal lock will enable management of the salinity of the bay to scientifically optimized levels. Oh yes, it will eliminate the need for the conveyance tunnel.
127	Carlin Black	By one estimate a million acre-feet per year is lost to evaporation from the aqueduct which is roughly 1/4 of the 6000 cfs tunnel. E.g. http://watermanagement.ucdavis.edu/files/4114/3891/2385/A01_Burt_Good_Shachar_Pascual_ESM121_FinalReport.pdf To pacify the contractors and especially the unions lobbying for the tunnel remind them that tunneling is machine intensive, while covering the aqueduct is a labor intensive construction job.
127	Carlin Black	Recycling ALL Waste Water Sooner or later all of Southern California is going to have to pump fresh water into their aquifers just to prevent salinization. Some coastal cities are having to do it now. There isn't enough water in the aqueduct to make a difference, and the only source of fresh water large enough is the waste water now being wasted. Aggressively treated this waste water could replace all of the water now diverted from Northern California. E.g. https://blogs.ei.columbia.edu/2011/04/04/from-wastewater-to-drinking-water/
128	Nancy Kuykendall	I want a no-tunnel alternative to be fully studied. California water is over allocated.
129	Californians for Water Security	We support a proposed capacity of at least 6,000 cubic feet per second and encourage the state to evaluate even larger capacities as well. We must have sufficient water flow to ensure the project is financially viable and that it provides the water security we need. Wastewater recycling, groundwater recharge, and desalination need fresh water to be most effective. We must take an "all of the above" statewide portfolio approach to secure California's water future.
135	Bayla Greenspoon	I am totally opposed to the Delta Conveyance one-tunnel revised plan. I support a "no tunnel" option.
136	Mike Ackley	What about solar to run pumps?
137	Ellen Koivisto	Please, pull yourselves out of the 19th century and start dealing with real problems facing us now. There's very little time in which to act, and no time at all for this kind of mindless, scientifically absurd, anti-biological idiocy.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Pursuing a single tunnel is just recycling a bad idea. Even with the smaller tunnel (though the final tunnel could be take almost as much water as the 2-tunnel project) and two intakes instead of three, the negative impact on the Delta and beyond is not reduced. A new Delta conveyance should be a last choice after all other considerations and activities. It is perhaps the easiest option but would inflict serious permanent damage to the richest agricultural land in California and negatively impact the economy of both the Delta and the state as a whole. In addition, it is not likely to adequately protect the threatened fish populations.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Reasons this project should not be built: Alternatives to a new conveyance have not received attention or direction from the state. You may say that these are not DWR's responsibilities but they should be implemented before any new conveyance is built. This would require support and financing from federal, state and local government agencies. One of the greatest needs in the Delta is to preserve, repair and strengthen our levees. Even if a new conveyance is built, the levees need to be able to withstand high water and severe storms as well as earthquakes. The current process and assignment of costs does not get the job

		done. • We need more recycling of our water and greater use of recycled water. The water discharged from many sewer plants (including Rio Vista) is often cleaner than the river. • The state should refine water conservation laws statewide to help both urban and rural areas pay for recycling, such as "purple pipes" to all areas of a community. Ramp up conservation laws – more can be done. Work with agriculture to reduce water usage and intelligently plant crops that take advantage of the soil and climate and provide a decent rate of return, not just big value crops. • Communities and the state should establish above ground and underground storage of water throughout California but especially in the southern half of the state. Limit ground water use where it threatens to cause subsidence. Do not allow SWP recipients to store water they don't need but get because it is in their contract, and then sell it making a huge profit from the state's water. • The State should seriously consider increased use of desalination plants along the coast and provide assistance in funding the construction of these plants.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Reasons this project should not be built: Thoroughly evaluate other locations for intakes that are not so damaging to towns and agriculture, such as Congressman Garamendi's suggestion to put a diversion on Sherman Island.
140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	The following items must be addressed in the EIR. 1. Demonstrate and quantify the progress made towards "Making Conservation A Way of Life." 2. Evaluate the Delta demands by setting a fair and equal statewide indoor and outdoor water budget, (i.e. 50 gallons per capita per day for indoor water use and 15 gallons per square foot per year for landscape water use). This would force regionally appropriate landscape choices and also be equitable for both northern and southern California residents. Thereby supporting the Water Resilience Portfolio (Jan 2020 draft) Water Supply Diversification goals 2.1 and 2.2 (pg. 18). 3. A "no project" alternative that investigates the true water demands for south of Delta users for drinking water only, not including landscape and other discretionary uses.
341	Dante Nomellini, Sr. Central Delta Water Agency	This is a huge expenditure and money for almost no benefit. And the problems of the state are far greater. This is like the last fix for a drug addict to have thinking that they're going to be able to get a lot of drugs later. There needs to be a major difference in approach. The fact that you guys are actually conceding that this is not a predetermined tunnel project, that you're going to look at alternatives, that's a major step in the right direction. And what we need to do is do what we can in the interim to get more water out of the Delta. But the projects are at least five million acre feet short by reason of a failure to develop north coast watershed water. So we've got five million acre feet of shortage and we've got the San Luis project that adds on top of it. So the problem in this state is going to have to be addressed in a real way to look at demand and reducing demand on other resources. And the areas that are importing water are going to have to get self-sufficient. It's not going to be available. We will try and help on a solution. We'll submit written comments. But by no means, would we ever accept an isolated facility such as a tunnel.
145	Meredith Cooper	The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a "no tunnel" alternative.

145	Meredith Cooper	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful and more economical than the tunnel and achieve the same water supply reliability goals and targets.
148	Eihway Su	Water conservation is the best way to deal with our water needs. Mandatory rationing especially for the agriculture industry that grows water intensive crops should be implemented instead of siphoning of water needed for the stability of our environment. Also waste water should be recycled. Unsustainable development should be stopped as well. These are all alternatives to this expensive proposal that does not deal with the limited water available for us all.
151	Felice Pace	The EIR MUST fully analyze and disclose alternatives to the Delta Conveyance in order to balance water supply and demand in areas south of the Delta, including reducing the acreage farmed which has been irresponsibly increased by corporate farms via vastly expanded tree plantings. Disclose how water demand south of the Delta has increased over the last 20 years and by which crops and by which major corporations. Please display an alternative that includes those who irresponsibly expanded irrigation south of the Delta being required to cut back to 1990 levels of irrigation.
153	Charles Wilson Southern California Water Coalition	We support a tunnel capacity of up to 7,500 cfs as the right size for the proposed project. In that capacity range, the project brings the most benefits in addressing impacts of climate change and risk of earthquakes while protecting water quality, supply reliability and native fish populations. Smaller capacity proposals simply do not provide the same value for the cost of construction. A tunnel size of up to 7,500 cfs with intakes above the anticipated sea level rise also ensures flexibility and efficiency in our water supply, enabling us to capture more water during wet years so it can be stored for dry years as well as preserve and recharge groundwater supplies.
153	Charles Wilson Southern California Water Coalition	We believe that building a large-capacity single tunnel under the Delta protects the state's most valuable and affordable water supply and protects the public's investment in the State Water Project, while safeguarding one of the richest ecosystems in the world.
154	Jacklyn Shaw	SoCal Metro knows that concrete costs more than Desalination. 90% live on California Coast. Also, "flooding" excuse is disingenuous, as formerly controlled for decades, by USACE Army Corps and others in deep, PURE Dredging. Lodinews.com reported that Lodi, only 12 miles from any Terminous tunnel, has the worst drought in February on recorded history. Proof that water exports do not work is in the Woodbridge/ WID vs East Bay/ EBMUD. Since 1929, Pardee Dam has exported Lodi Mokelumne River, Aqueduct towards Port Of Oakland. Across its port is UCB, where at Doe library, Jacques Leibovitz, Ph,D., 1977, has article on Desalination. It has been used in Israel, Australia and over 100 nations.
154	Jacklyn Shaw	P.S. More on Squiggly Pro Quo of Broken Promises in Water exports, socialism. There is dry Mono Lake in Owens Valley, advocating for Rivers, tributaries, after Los Angeles fiasco. And Anderson Dam soon flooded Silicon Valley, February, 2020. Maybe we need to advocate . . . for Delta west tunnel, near that extra ship canal? (Duck hunters will be OK; but they could focus legal shots on big nutria rodents tearing down the levees. Don't hurt the beavers.) Save the rivers.

155	Samuel Butler	A far more sensible, economical and environmentally sound approach is to look at alternatives that cause minimal disruption, such as conservation measures in our cities and farming industries, more water efficient agricultural practices and soil conservation measures, along with better water capture systems within our infrastructure. Thankfully some of these are already being planned and implemented. Let's do more of this and achieve our water goals in a far more efficient and less disruptive way.
159	Jay Uhalt	Please consider other methods of getting water to the southern valley and L.A. basin. Conservation number one. Many in the L .A. area have no idea that much of their water comes from northern California. More above ground storage is another good idea. Streamline the permit process for dams. Also recycle, all new home should have grey water and black water systems.
161	Dr. Steven White	UNDENIABLY UNSUSTAINABLE. California's water use pattern is unsustainable. Our rivers are over-allocated even during increasingly rare "wet years", and in a number of areas across the state groundwater has been and/or is being severely over-drafted [1, 2, 3, 4, 5, 6]. The most recent 2020 measurements of snowpack in the Sierra revealed levels only about half of the historical norm [7], and this late in the season it is unlikely that a massive increase in the snowpack will occur. These conditions, while severe, are hardly novel, and have been a relatively recurrent feature in California over the past decade. In the face of this reality, a re-examination of California's water use pattern is critically important and necessary if irreversible ecosystem collapse in the San Francisco Delta is to be prevented. Over the past five decades or more, demand for water exports out of the SF Bay Delta have slowly but steadily increased, to the point that currently freshwater flow to the Bay is on average less than 50% of the native, unimpaired flow, and is further decreased to 35 % or less in some years [8, 2, 9]. As stated by Rozengurt et al in The Role of Water Diversions in the Decline of Fisheries of the Delta-San Francisco Bay and Other Estuaries over 30 years ago [10]: "Published results regarding water development in rivers entering the Black Sea, the Sea of Azov, the Caspian Sea and the Mediterranean Sea in Europe and Asia all point to the conclusion that when successive spring withdrawals exceed 30% and annual (total) water withdrawals are more than 40-50% of the normal unimpaired flow (computed as the average for 50-60 years of observations), water quality and fishery resources in the river-delta estuary- coastal zone ecosystems deteriorated to levels which overrode the ability of the system to restore itself". Rozengurt's conclusions and dire warnings, unheeded at the time, have since been shown true. The collapse of the salmon populations using the SF Bay Delta is now well documented [11, 12 13, 14, 15. 16], as is the precipitous decline of the salmon fishing industry. Winter-run Chinook salmon (listed as "endangered" since 1994) remain endangered, and apparently only survived a recent drought through a captive breeding and rearing program [17]. Spring-run Chinook salmon are currently listed as "threatened", late fall-run Chinook salmon remain a species of "special concern", and the native San Joaquin fall-run Chinook salmon (a species of "special concern") are all but gone, with the wild (native) population replaced by a hatchery-derived population [18]. These drastic reductions in populations are not, however, just limited to salmon. The green sturgeon population is similarly listed as "threated" and it's numbers also severely reduced. The Starry Flounder population has declined an average of 90% since 1980 [2]. The Delta Smelt and Longfin Smelt populations, both listed as "threatened", have declined by an average of 99.5% and are "near extirpation" (near extinction) in the San

		Francisco estuary today [19, 2, 20,21,22]. Invertebrate populations (Bay Shrimp, for example) are falling dramatically [2, 23,24]. The productivity of photosynthetic algal populations is declining as turbidity increases and ammonia and other pollutant concentrations (from improperly treated sewage and industrial and agricultural runoff) increase [2, 25, 26, 27, 28], which in turn contributes to the production of toxic algal blooms. The evidence for the continuing collapse of the Bay and Delta ecosystem is thus growing and uncontestable. We are strangling the river systems that drain into the Bay and Delta, withdrawing so much freshwater that the complex ecosystem they support is collapsing. The freshwater flow into the Bay and Delta simply can not be reduced to less than 50% of the total annual unimpaired flow it would naturally receive. To withdraw more… as this "single tunnel Delta Conveyance project" would do when paired with the other restrictions in freshwater flow to the Delta already in place… virtually insures the collapse of the Bay/Delta ecosystem. It is now imperative that we develop a mix of water conservation, recycling and reuse technologies and policies in California that can provide freshwater without driving ecosystem collapse. Those options will be discussed later in these comments.
161	Dr. Steven White	Finally, why is the single tunnel project the only alternative presented to the public at the Notice of Preparation (NOP) Scoping meetings, while an equally robust "water conservation/recycling/reuse" option (see comments below) is not? Numerous studies suggest that most or all of the freshwater needed could be supplied through this second option without incurring the cost and environmental damage associated with the "single tunnel" plan [3, 31]. These are but a small portion of the considerations that should be addressed in the Delta Conveyance Environmental Impact Report.
161	Dr. Steven White	CONFRONTING DEAF EARS and TUNNEL VISION… DEVELOPMENT OF A "MARSHALL PLAN" FOR WATER CONSERVATION, ENVIRONMENTALLY SOUND WATER CAPTURE, REUSE and RECYCLING IN CALIFORNIA. Developers and supporters of the single tunnel "Delta Conveyance Plan" do not want to discuss a water conservation/recycling/reuse alternative. They only appear willing to discuss the "One Tunnel Delta Conveyance Plan" as the ONLY solution for freshwater collection and distribution.
161	Dr. Steven White	In light of California's continually growing population and their associated water demand, along with growing industrial and massive agricultural water demands [32], a fundamental "new" fact of perpetual water scarcity must be faced. The idea that we can simply continue to export more and more freshwater from the Delta and tributary river systems has become increasingly unsupportable and ever more absurd. ANY water allocation and management plan proposed by the Department of Water Resources MUST now include a fully integrated conservation plan that encompasses the following: --Changes/Improvement of Agricultural water use and efficiency. --Changes in Land Use [33, 34, 35]. --Selection of Water Efficient (less water demanding) Crops. --Improvements in Irrigation Technology[36, 37, 38]. --Changes/Improvements in Soil Management [39, 40]. --Increased use of Mulching. --Increased use of Cover Crops and Rotation of cropland use. --Changes/Improvements in Urban yard water use and efficiency [41, 42]. --A reexamination of the urban yard and its water requirements. --Use of Water Efficient (less water demanding) plantings. On average, outdoor water use in California is thought to account for about 50% of all urban water consumption. --Changes/Improvements (increases) in Rainwater Capture across all sectors (urban,

		industrial and agricultural) 28]. --Building in water capture and/or aquifer recharging capabilities in urban, industrial and agricultural settings.
161	Dr. Steven White	--Changes/Improvements (increases) in Greywater capture and reuse across all sectors [44]. --Changes/Improvements (increases) in Water Recycling across all sectors. and --Changes/Improvements (increases) in Detecting and Stopping Leaks throughout the Water Distribution System in California [45, 46, 47]. In the absence of such a comprehensive conservation strategy the single tunnel “Delta Conveyance” plan is a colossal mistake, and will ultimately insure the demise of a critically important “Bay-Delta-River Tributary ecosystem” upon which much of the state depends.
162	Gene Beley	For $1 billion you can build a desalination plant like Orange County and San Diego did in Carlsbad and get NEW inputs of water... like 57 million gallons a day, which makes more sense.
164	Barbara Epstein	Please consider NO PROJECT! Study alternate means to achieve the same goal. Study the water management strategies of the City of San Antonio to see if underground storage is feasible here in California. Capture and store underground to limit evaporation. Listen to our native people and conservation groups, like Sierra Club, for guidelines.
166	Brian Kreb	This is the only inland delta in the world, it needs to be cared for and protected. Pumping of water out of Clifton Court Forebay should be regulated and limited during drought years. I do support re-engineering of the Forebay to reduce the entrapment of native fish populations. I am a born and bread Californian who wants to see a proactive approach to make sure the delta and the people who rely on it can sustain a healthy future.
170	Rick Downey	I strongly object any effort to take water out of the delta to transfer anywhere else. understand that there are farmers in the San Joaquin Valley that provide a vast amount of food. However, it is time to face some facts. When the first Spaniard explorers arrived, they described California as a "semi-arid region". It was only during the 1900 ~ 2000 century that California had the mild and rain filled period of time. It is obvious that California is no longer having the amount of rain we had during the last century, nor is there any evidence that it will return to that state. The opposite is true. To try to ignore this fact is typical of man's futile attempt to control nature. The farmers need to change their livelihoods, and we have to find other sources of food, or less water dependent crops. For example, studies show that it takes 1,900 gallons of water to produce one pound of almonds. It is obvious that they need to STOP GROWING ALMONDS in California!!!!! Fish populations from the delta are NOT recovering, and southern Californians need to stop depending on northern Californian water.
171	William Roltsch	Alternative plans are of key interest. Would an above ground “tube” be possible, avoiding many problems with underground tunneling? Perhaps this could affect time and cost in a positive manner. Has a low, less obtrusive profile “tube” with a different shape (example: flattened oval) been evaluated for above ground deployment?
173	Patricia Atkins	Please NO to the Tunnel! Please spend a fraction of the money & revitalize and update Clifton Court Fore-bay and the current water canal system. Please regulate the farming in Central California and not allow unsustainable water thirsty crops, such as almonds. Do not damage our Delta System this way!!!!

179	Helen Harberts	Until all of the California Aqueducts are re-built, resealed, suppressed and covered to prevent loss from leaks and evaporation, I oppose any project which moves water past the already established Delta protection plan in place.
179	Helen Harberts	In addition, all marginal lands should be removed from agricultural use, and crops which are water intensive such as cotton, should be banned in low water areas. CA is a desert. Act like it.
181	Liz Elias	The fact of the matter is that it is not the fault of Northern California that Southern California chose to build huge cities in a desert. They need to become self-sufficient in their water needs, including building desalinization plants and becoming very conservative in water use and recycling of water for agriculture. Continuing to subsidize their wasteful ways does nothing to encourage conservation.
181	Liz Elias	Water shortage due to precipitation variance is cited. However, this is a specious argument, because it does not matter what causes the shortage, be it climate change or earthquake, the fact remains that we in California must all be far more conservative in our use of this precious resource. In point of fact, the natural ecosystem is far more resilient in the face of natural occurrences such as quakes than any tunnel would be: that could indeed rupture with disastrous consequences. This environmentally dangerous project must be abandoned once and for all!
186	Phyllis Johnston	Commenter suggests that the EIR should examine a no tunnel alternatives, analysis of water conservation, efficiency and demand reduction.
186	Phyllis Johnston	Comment suggests alternatives such as storm-water capture and other non-destructive alternatives.
187	Marci Stanage Southern California Partnership for Jobs	Modernizing and upgrading our state's aging infrastructure with a single tunnel, properly sized to convey 6,000 cubic-foot-per-second of water supply for the State Water Project, will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes.
188	Rosalie Preston	Consider evaluating a no tunnel alternative, citing a no tunnel option as less costly to Southern California residents and least impactful to habitat and water supply in the Delta area.
189	Maximilienne Ewalt	Consider alternatives such as incentives to homeowners and requirements for new construction to install grey-water recycling systems throughout the state.
189	Maximilienne Ewalt	Consider alternatives such as underground water storage and use of grey-water for agricultural production.
191	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	EJ demands alternatives that save lives and protect the water project. -Strengthen the levees
192	Christine Huttinger	Special interest individuals and groups have pushed tunnels through the CA Delta as a favorable water fix. It also seems obvious that there are alternatives fixes that would have reduced negative impacts.
193	Josephine Sambado	Consider a no tunnel alternative
194	Lynn Whelden	Consider desalination as an alternative.

194	Lynn Whelden	Consider limits on growth and residential building in southern California unless water can be obtained locally.
196	Jasmine Leek Third City Coalition	Consider other alternatives and prioritize preserving/protecting the Delta.
201	Kristen Oliner Restore the Delta	A single tunnel is not an acceptable alternative
205	Frank Toriello We Advocate through Environmental Review (WATER)	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets that the tunnel project proposes. This might be best accomplished by stopping water deliveries to Westlands Water District where ever more thirsty crops as almonds are being planted, mostly for export.
208	Morgan Lindsay	Consider alternatives to the challenges posed by rising sea levels due to climate change.
212	Pat Lind	Examine a no tunnel alternative. Examine desalination plant alternatives, gray water systems, and recycling.
215	Nicolas Wilde Dream Quest	Consider water rationing and conservation. Utilize rainwater collection and storage. Examine graywater regulations. Incentivize lifestyle changes that would negate the need to transfer water across the state.
216	Jenny Staats	Analyze costs and benefits of a no-tunnel alternative.
216	Jenny Staats	Analyze investment in water conservation
217	Allesandra De La Torre	Look at a no tunnel alternative
235	Tim Stroshane Restore the Delta	Typically, DWR drafts its Delta conveyance EIRs so that alternatives are considered to be simple variations on a theme—if a tunnel is wanted, then different flow capacities and different diversion points are considered as alternatives. But the realities that are dimly recognized within the project's purpose and objectives (discussed above) include seismic and climate risks. These are significant risks. So it is entirely reasonable that non-tunnel and non-diversion alternatives come under consideration in this Draft EIR. We urge DWR to devise an investment program that continues through-Delta conveyance, subject to the rules of water quality plans and biological opinions, but which seeks to boost local and regional self-sufficiency as an alternative that seeks to addresses seismic and climate risks for SWP customer service areas. How does such an alternative perform compared with the reliability of supplies garnered by a DCP and other tunnel-based conveyance alternatives? The Draft WRP was short on specifics when it came to a true assessment of California's future water needs, unfortunately, and missed an opportunity to conduct a meaningful needs assessment along the lines we describe in our report, Climate Equity and Seismic Resilience for the San Francisco Bay-Delta Estuary (see Appendix B).
236	Kathleen Stein	If runoff is to be collected and stored from rain in So. Cal isn't it prudent to see this implemented prior to approving any other method?2. PG&E has an over abundance of power due to renewable energy sources and desalination plants need this to operate, shouldn't these be built in order to avoid the damage to the

		estuary by the fresh water not flowing through it. A tunnel may be best but to replace the current conveyance aqueduct, not to draw water from a new spot. This would reduce evaporation. Therefore it would save water and wouldn't this be better than decimating the Delta further? If all the above methods were used then there should be enough water for everyone Right? Furthermore I believe the current system for ownership and conveyance of water would be better for all people if there was a federal system for transporting water from the areas with an over abundance to the areas with a shortage. Much like the railway system. No one person should own the water it should be treated like the air and the sun!
241	Ann Dorsey	There are better ways to secure our water. Actions can be taken to optimize the amount and way we use water by: installing meters wherever water is not currently being metered, only providing subsidies or reduced rates to family farms or small businesses that can prove they are in need, making it illegal for businesses that receive subsidized and / or reduced rate water to sell it to others, increasing water use efficiency especially for agricultural and other major water users, doing more to conserve water, educating everyone about what they can do to keep our water clean (e.g. fertilizers, pollutants, trash and vegetation out of sewer drains), strengthening enforcement of water pollution laws for business, and taking actions to maximize the use of water where it is such as improving water capture and storage capabilities which will both provide water when it is needed and raise ground water levels, and cleaning contaminated groundwater so it can be used, thereby minimizing the need for moving water across the state.
241	Ann Dorsey	The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a "no tunnel" alternative. The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
241	Ann Dorsey	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs. For ratepayers in Southern California, it is important that you have comparisons to a no-tunnel option in terms of financing.
247	Jeffrey Kightlinger Metropolitan Water District of Southern California	Overall, Met supports the proposed project for Delta Conveyance: one tunnel, sized to convey 6,000 cfs of water supply for agencies like Met that contract for participation in the SWP. While it is appropriate for the environmental process to examine a range of sizes, previous analyses have shown that smaller facilities do not proportionately reduce costs, as opportunities to sufficiently capture high stormwater flows are lost. The project and its alternatives must be cost effective. We believe a 6,000 cfs facility has the greatest possibility of fulfilling this need. We understand that the costs as compared to benefits goes up sharply as the capacity is reduced below 6,000 cfs. Therefore, the EIR should not evaluate alternative capacities that the PWA investors would have no interest in funding because the economic benefits and cost effectiveness would not exist.
247	Jeffrey Kightlinger	We agree with the NOP that an alternative capacity of up to 7,500 cfs should be evaluated in the EIR. A 7,500 cfs facility could also help accommodate CVP use, if CVP contractors and the Bureau of Reclamation decided to participate in the project.

	Metropolitan Water District of Southern California	
247	Jeffrey Kightlinger Metropolitan Water District of Southern California	We also support the two corridors to be examined for a tunnel facility, a "central" route similar to that of California WaterFix and an "eastern" route closer to Interstate 5. Fully examining these two corridors shows great promise in identifying an ultimate route that minimizes potentially significant impacts to the Delta region.
247	Jeffrey Kightlinger Metropolitan Water District of Southern California	Alternatives to the project that are evaluated in detail in the EIR must meet the project objectives. Projects that improve local water supply reliability, for example, while essential to California's overall water reliability picture, are not alternatives to the proposed Delta Conveyance project under CEQA because they do not meet the project objectives; objectives which we support.
248	Tom Williams	Provide Non-Tunnel Alternative for improved reliability of Delta flows, Improved Levee Alternative, including slurry/grouted cut-off walls within levees and at least 50% of levee height beneath the levee (e.g., 50ft levee height with 75ft deep/height cut-off walls.
248	Tom Williams	Provide in the Improved Levee Alternative additional provision of "High K-Rail" for raising top of levee by 3-5ft on temporary and then permanent basis
248	Tom Williams	Provide alternative description and assessment for the shortest practical tunnel route as shown below (dead-straight route) without turns/curves in the tunnel portion and two shafts (two starter/launch shafts with double TBM meeting within the "middle" of the tunnel line). A: 37 miles/white line Courtland-Hood-Clarksburg miles C: 42 east/bottom B: 39 middle Provide alternative descriptions and assessments for single, highest intake for 6000 and for 7500cfs flows.
249	Bryan Griess Transmission Agency of Northern California (TANC)	If additional surface water storage as a Southern Forebay is needed near Clifton Court Forebay for DCP operational purposes, TANC supports alternatives that locate the Southern Forebay northwest of Clifton Court Forebay as envisioned in the proposed California WaterFix project of July 2018 (Figure 1)
249	Bryan Griess Transmission Agency of Northern California (TANC)	If additional surface water storage as a Southern Forebay is needed near Clifton Court Forebay for DCP operational purposes, TANC will find unacceptable any alternative that locate the Southern Forebay south of Clifton Court Forebay as envisioned in the Approved California WaterFix project of 2017.
249	Bryan Griess Transmission Agency of Northern California (TANC)	If any transmission tower relocations are proposed in any location or as part of any alternative, the following environmental and economic considerations are relevant to the development of such alternatives. DWR and DCA would be responsible for the following: Full funding of all environmental studies, permit applications, and all other regulatory compliance requirements and consultations needed for relocating COTP ROW within or outside of the existing DCP study area All new, additional and/or replacement right of way lands that may need to be acquired for relocation of the existing transmission towers. Acquisition of the new ROW's must include rights fully equivalent in all respects to the current rights. Full ownership and transmission entitlements associated with those rights will need to be vested completely to TANC and the COTP participants. All costs for design and construction of any temporary transmission towers that will be needed to maintain COTP service levels as the COTP is relocated to new

		ROW. All costs for the design, construction, commissioning of the permanent replacement 500-kV line of equal or greater capacity. Payment of all lost revenues resulting from outages needed for relocation, replacement, interconnection. All associated litigation costs.
251	Loren Rhodes	Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
254	Congressman John Garamendi	Consider examining a potential western route for the new Delta conveyance project as part of the environmental review process. Your CEQA process must include the western route utilizing existing conveyance infrastructure like the Sacramento Deep Water Ship Channel. If DWR refuses to consider a western alternative, you owe Delta residents and the people of California an explanation in writing. You must explain when the decision was made to not consider the western route, by whom, and why. To my knowledge, no such explanation has been provided by the state to date. This raises serious concerns about a lack of public transparency. Enclosed are my May 8, 2019 letter to Governor Newsom and my February 7, 2020 public comment on the "draft Water Resilience Portfolio" outlining the numerous advantages of a western route for any new Delta conveyance project. Governor Newsom's executive order (N-10-19) issued on April 29, 2019, directed state agencies to reassess both the 2016 California Water Plan and "current planning to modernize conveyance through the Bay-Delta with a single new tunnel project." I do not see how your Department can fulfill that gubernatorial directive without at least considering a western route as you prepare the environmental impact report for the Delta conveyance project. Significant feasibility and scoping work for the western option has already been completed in the Department's November 2009 conceptual engineering report, as part of the state's then-Delta Habitat Conservation and Conveyance Program, and the analysis for the Bay-Delta Program (CALFED)in October 1997.Any effort to modernize the Delta water system as directed in the Governor's executive order must include an honest and complete study of the western conveyance route. Again, I urge you to fully consider the western option and analyze its pros and cons relative to the "central tunnel corridor" and "eastern tunnel corridor" proposals in any final environmental impact report.
254	Congressman John Garamendi	(Attachment to comment letter) A westside route utilizing the Sacramento Deep Water Ship Channel and then continuing southward to the Tracy pumps, using existing conveyance wherever possible, is the best way to minimize impacts on productive agricultural land, flood risk, and the environment. Indeed, a westside route fora single, right-sized pipeline at no more than 3,000 cubic feet per second (CFS) design capacity is the only project that can earn the support of Delta communities and landowners, including me. The Sacramento Ship Channel ends 25milessouth near Rio Vista, where a pressurized pipeline spanning a mere 12 miles beneath the Sacramento and San Joaquin Rivers could deliver water along the eastside of the Old River channel leading to the Tracy pumps. The westside, single conveyance proposal was originally developed with support from environmental groups and Delta water users when I served in state government during the early 1990s. Now nearly three decades later, the westside proposal has withstood the test of time and may finally come into its own with your support.

254	Congressman John Garamendi	(Attachment to comment letter) I am pleased that the draft Water Resilience Portfolio reaffirmed the Governor's commitment to abandon the Twin Tunnels (WaterFix) project and consider alternatives. Unfortunately, the planning and scoping process for the now-defunct Twin Tunnels failed to adequately consider a western route and instead focusing solely on the eastern alignment for the tunnels. On May 9, 2019, I wrote to Governor Newsom urging him to consider a smaller conveyance project along the westside of the Delta. In the letter, I outlined the following:•Utilize the Port of West Sacramento and the Deep Water Ship Channel as the first segment of the western conveyance facility, by installing a fish screen and low-head pump at the existing lock on the Sacramento River and allow water to flow into the port and channel. Build a lock at the southern end of the Ship Channel 25 miles south near Rio Vista to separate the Sacramento River water in the channel from the water and species in the Delta, thereby safeguarding smelt or other endangered fish from entrainment in the pump located north of the lock. This ship lock would also provide passage for ships transiting to the Port of West Sacramento. Construct a pressurized pipeline, sized between 3,000 to 4,000 cubic feet per second (CFS), from the pump north of the ship lock to carry water to three new reservoirs (Bacon Island, Holland Tract, and Webb Tract)in the central Delta, which are already owned by the Metropolitan Water District of Southern California and could be permitted for water storage. These islands are strategically lined up to provide direct access to the pumps for the Central Valley and State Water Projects near Tracy. An alternative is to locate the pipeline along the eastside of the Old River channel to the Tracy pumps. Locating the conveyance facility on the west side of the Delta and using existing conveyance, wherever possible, may prove to be less expensive and certainly would avoid the eastern alignment's damaging impacts on historic communities, the fragile Delta ecosystem, and productive agricultural land. The western alignment would result in less land subsidence and flood risk. Any effort to modernize the Delta water system must include an honest and complete study of the western conveyance route. Attention must be paid to the November 2009conceptual engineering report completed for the Department of Water Resources on the western isolated conveyance facility. This 2009 report was part of the state's Delta Habitat Conservation and Conveyance Program. As noted in the report, an analysis for a proposed conveyance project along the western perimeter of the Delta utilizing the Sacramento Deep Water Ship Channel was also completed in October 1997for the Bay-Delta Program (CALFED)and found to be viable. The east side canal option contemplated in these state documents was the infamous "Peripheral Canal," which was soundly rejected by California voters in a 1982 ballot referendum (Proposition 9). In subsequent years, the open canal and eastside route became the extraordinarily expensive Twin Tunnels (WaterFix) project.
255	Sandy Rhodes	Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
259	Dan Bacher	Is there a preferred alternative between the two tunnels, the conveyance paths. Is one alternative preferred over another? In other processes, there was a preferred alternative.
265	Molly Culton Sierra Club of California	We strongly advise that DWR fully assess a no-tunnel alternative.

265	Molly Culton Sierra Club of California	The EIR should analyze alternatives that increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a no-tunnel alternative.
265	Molly Culton Sierra Club of California	The EIR should analyze water conservation efficiency and additional demand-reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets that the tunnel project proposes.
265	Molly Culton Sierra Club of California	The EIR must analyze the tunnel's cumulative impacts … including … where the tunnel intakes would be…
265	Molly Culton Sierra Club of California	Analyze impacts on tunnel alignments since the proposed eastern alignment has potential for significant urban impacts for Delta residents and impacts incurred during construction of the tunnel and the reservoirs required for water storage.
268	James Dunlap	Look into desalination plants.
269	Jeff Durbin	Look at the no-tunnel alternative.
270	Kyle Griffith Californians for Water Security	We thank the DWR for holding these scoping meetings to look at proposed alternatives, and we're in support of the 6,000 cubic feet per second project outlined in the NOP.
274	Mariah Looney Restore the Delta	With the new proposed eastern alignment, there is a significant number of increased urban impacts for all residents, but even bigger impacts for residents living near the Port of Stockton. By taking more and more Sacramento River water, the Delta will be left with salty, polluted water loaded with selenium, boron and bromides.
275	Osha Meserve Local Agencies of the North Delta	There are alternatives to the tunnels that have not been explored, and we would like to see those explored at the very least in the NOP or it should be done really now rather than before we get into the EIR. We were told at the construction JPA meeting that this is the only place in the Delta where intakes could be located according to the fish facilities technical team. That's incorrect. The fish technical team, ten or more years ago, was asked to look at this stretch and gave advice about what studies would need to be done. They did not endorse this area for the only place for intakes. We think if you do need new intakes, we should be looking at the West Delta where we could be operable only in high flows would be an option. We also think the no-tunnel alternative needs to be developed. That would, of course, include strengthening the levies for through Delta water supplies. In addition, the intakes in the South Delta are not highly subject to sea level rise and the levies can be raised to accommodate that.
275	Osha Meserve Local Agencies of the North Delta	Ultimately, as we recommended for the governor's portfolio group, for the resiliency plan, in addition, brackish water treatment could be done in the South Delta, which could be a very feasible way to keep that water quality fresh, even if the salinity goes up.
275	Osha Meserve Local Agencies of the North Delta	I see there is a new corridor being looked at to the east, which potentially could reduce construction impacts on some boating, I think it would create other impacts in those areas.

275	Osha Meserve Local Agencies of the North Delta	There is no good place to put this monstrosity, and it's not needed for the state. So we need to keep looking for alternatives, and I think everyone here is willing to help with that, but it's not right to come back to the same old project after telling us that you're getting a new start.
276	Emily Moloney Buena Vista Rancheria of Miwok Indians	We hope you will consider a no-tunnel alternative.
276	Emily Moloney Buena Vista Rancheria of Miwok Indians	Consider alternatives to reduce or eliminate impacts to tribal resources.
280	Bob Saunders	We need to start looking to our European friends who have many, many alternatives to our really wrong-headed 19th century ideas about how to deal with water, moving water, dealing with environment, dealing with ecology and things like that. We're going to keep working our way towards extinction if we keep going down this foolish path.
281	Monique Sonoquie	Mandatory conservation should be considered. Building tunnels won't bring more water. Mandatory conservation is important, especially for big business. Stop water subsidies for agriculture. Stop wasteful water techniques; work. Work on more dry farming, sustainable methods in California. If you increase the dry farming and other things I'm suggesting, you'll have a clean water supply. Doing the opposite, we'll have less and more polluted water. Go beyond how much water we can get. Look at how to make sure our water is pristine.
281	Monique Sonoquie	How do you improve the tunnel, instead of making it bigger and deeper? Cap it, put solar panels on to create more energy, put micro hydra within it to create more energy. Those are all modern technologies. Why aren't we using it?
288	Charlene Woodcock	Water waste and wealthy communities should be 14 redirected to more conservationist views and policies 15 and requirements and certainly industrial agriculture 16 should be required both to conserve water, but also to 17 reconsider the kind of plants. The almond orchards I 18 saw planted, new almond orchards in the middle of the 19 draught, just unbelievable. Californians should not be 20 supporting that. Southern California water districts are 22 recognizing the need to conserve water there to clean 23 water to distribute gray water in ways that can relieve 24 the pressure on fresh water, and that needs to be a 25 consideration here. L.A. is working hard at this. So to consider -- to continue using L.A. as an excuse 2 should stop.
289	Bob Wright Sierra Club of California	And you've heard a number of people talk about the no-tunnel alternative, and they're not talking to you about the CEQA-required no-project alternative. That you have to consider under the law, the California Environmental Quality Act. What they're talking to you about is a separate project alternative, which is finally, after all these years, really a decade, looking at reducing exports, not just to reduce exports, but that's to increase the fresh water flows through the Delta, begin to save and restore the Delta. And instead of focusing on a multi-billion dollar public works project, instead, focusing on modern things, conservation and recycling. And what they're saying to you is that would even reduce -- that would then eliminate even

		any claimed or arguable need for the tunnel project, which would cost billions of dollars. And we know the reason DWR has never wanted to and has consistently refused to put this alternative before the public, because the people in the public are saying, "Well, wait a minute. We can save billions of dollars, not build this massive public works project, and we get to save and start to restore the Delta." 10 That's a no-brainer. 11So this time around, in your deed, your draft EIR, even though you don't want to do it, put in an alternative that would reduce exports to increase fresh water flows, and that would mean no tunnel.
291	Dan Drugan Calleguas Municipal Water District	The State will be investigating a spectrum from 3,000 to 7,500 cfs to look for alternatives. Do not prematurely preclude the alternative right now, as we go through cost allocation negotiations, for participation with the State Water Contractors and Simi Valley Contractors.
292	Bruce Campbell	We need a no-tunnel alternative and not merely a no-project alternative.
294	Michael Lewis Construction Industry Coalition on Water Quality	Include a twin-tunnel alternative among the options. Don't make the mistake we made on the first round by not including a single tunnel option. No legitimate evaluation can be done without including the original project as an option for comparison purposes.
301	Steve Arakawa Metropolitan Water District of Southern California	In terms of the scoping comments, Metropolitan supports a 6,000 cfs tunnel. That's the appropriate size for the proposed project, and that does the most to address climate change, seismic- risk resiliency, protect water quality, support supply reliability, and protect native fish. Sizing the project flow capacity sufficiently large is necessary to reliably capture storm water flows. Smaller capacities do not proportionately reduce expenses, but they do disproportionately impact this ability to capture important peak storm flows, to plan for sea level rise, and to adjust to outcomes due to earthquakes.
302	Mario Milch	I am not an expert in water or water quality, but I would like to just throw out some possible alternatives. My understanding is this project would cost at least $100 million -- probably a lot more by the time it's finished. And I know that the technology has improved greatly to the point where water can be recycled safely. And other alternatives, of course, are better rain -conservation of the water that could be stored, other, obviously, projects that reduce consumption, and I think there's been a lot of progress in this. And the other alternative that I wonder if has been considered is to just strengthen the present aqueduct and somehow, you know, make it maybe more reliable and more likely to survive an earthquake. So I just wanted to throw out these possible alternatives to -- hopefully they will be studied and considered.
303	Robert Hunter Municipal Water District of Orange County	In the alternatives section of the NOP, you write: "An EIR need not consider every conceivable alternative to the project. Rather it must consider a reasonable range of potential feasible alternatives." And further: "DWR is currently considering alternatives with capacities that range from 3,000 to 7,500 cfs." In this regard you are outside the bounds of sound science, engineering, and economics. Over several years, DWR spent $273 million on an EIR for the Delta WaterFix -- a different project, as you noted. This effort considered over a hundred alternatives and formally evaluated 18. The conclusion of that effort was -- a further alternative was 4A - - a 9,000 cfs alternative. The proposed range of alternatives does not even overlap this preferred alternative from the previous effort. Given your previous analysis, your current range of alternatives is not a reasonable range, as required under CEQA.

305	Derek Ryder	What the Department of Water Resources should consider in their EIR scope: An alternative that increases Delta outflows and reduces exports, i.e., a no-tunnel alternative. The EIR should analyze conservation and efficiency measures that are less harmful than the tunnel alternatives.
305	Derek Ryder	It should analyze the cumulative impacts of each alternative, specifically impacts to climate change due to conveyance and the effects of subsidized water on encouraging sprawl, water quality in the Delta, species viability in the Delta, and it should analyze the financial concepts of the likely budget on Southern California ratepayers versus a no-tunnel alternative.
305	Derek Ryder	The Delta tunnel EIR should not be limited in scope to tunnel sizes large, extra large, and extra, extra large, but rather include a no-tunnel alternative that takes into account the larger context of the Delta and of water exports to Southern California that may, in fact, not be needed and do more harm than good.
307	Brandon Dawson Sierra Club of California	As such, we strongly advise and encourage DWR to assess a no- tunnel alternative. This alternative should be separate from the CEQA-mandated no-project alternative wherein the DWR is only legally obligated to discuss what is reasonably expected to occur in the foreseeable future if the project is not approved. Instead, the no-tunnel alternative should analyze the State's use of investment, programs, and projects that increase Delta output and produce export s from the Delta.
307	Brandon Dawson Sierra Club of California	Projects relating to water conservation and efficiency, storm water capture , and other export reduction measures that achieve the same water supply reliability goals and targets as the proposed project are both less environmentally destructive, versus what California has done many times in other areas of the environment, and less costly than the proposed project.
307	Brandon Dawson Sierra Club of California	And if the State is truly concerned about water reliability, earthquake damage, and salt water intrusion from sea level rise, we urge the State to invest in and strengthen the existing Delta levees and infrastructure. We don't disagree that they need to be modernized, but we just argue that there doesn't need to be additional ones and increase fresh water flows in the Delta. Both of which are far more efficient and cost-effective ways to ensure water reliability for Californians.
329	Nicholas Hatten LGBT Social Justice Initiative	We know the challenges we have with our levees, the threat of climate change, and the ever returning poisonous algae issue, none of which this proposal addresses yet.
332	Earl Jones	There is one and only one source of water which can be considered reliable at this point. It's called the Pacific Ocean. And when people are ready to face up to the need for large scaled desalinization, ready to open their wallets for it, that's when we can get something useful done about water supply.
332	Earl Jones	Right now, we're pouring sand on the riptide. It's -- I want to see alternatives that are not just no action alternatives. I want to see alternatives that are no diversion alternatives.
333	Roger Kelly	They need do desal -- we need to come up with other solutions. We can't keep pilfering from a source that's already over exceeded its level. The time is done. We need new solutions. This one has got to get scrapped.
334	Clarence Kooi	I would like to propose an alternative to the twin pipes.
334	Clarence Kooi	At the present time, a lot of the water from the San Joaquin River flows over to the pumping plants through other channels instead of going down the river. This is the San Joaquin River. Okay. This is the San Joaquin

		River. A lot of the water goes over here to these pumping plants which are right down here from the San Joaquin River. So my proposal is to block out those entries here and all along, block them off so water flows down the river. That way, the salmon follow the river, instead of getting lost in here.
334	Clarence Kooi	And then, of course, the Sacramento River would be -- flow as it does now. What's wrong -- and then to these back channels, the water would flow to the pumping stations. What's wrong with that? Well, saltwater intrusion. When you have the water flowing back down to the pump, you have saltwater intrusion. So then we use a saltwater barrier way down here in the Carquinez Straits. This was proposed in 1929, but not built because it was considered that the flushing action of the rivers would be sufficient to keep the saltwater at bay. Well, it isn't anymore. So we put in the saltwater barrier, an9 we have all the water flowing down the rivers to this point, and then flow back here without saltwater intrusion. And that's perfectly feasible.
334	Clarence Kooi	And, as a matter of fact, in bulletin 22, 27 of the Department of Water Resources, this has all been worked out. And we evidently have forgotten that. At that time, it wasn't built because the flow from the -- in the rivers was considered sufficient to keep the saltwater at bay. So my proposal is to cut off these exits from the river. Let the water flow back to the pumps through these various channels, like right here -- and saltwater barrier.
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	We do not see that strategy such as water conservation and waste water reclamation have been employed at the fullest extent possible by export users to minimize reliance on the Delta as required by the Delta Reform Act.
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	Finally, the League of Women Voters of California has not seen any good faith effort on the part of those promoting Delta conveyance to consider alternatives to conveyance for meeting the state's 21st Century water challenges. We hope you're serious about considering real alternatives to conveyance.
337	Elaine Baret Little Manila Rising	A no tunnel alternative would be best for our community.
339	Chris Neudeck Kjeldsen, Sinnock & Neudeck	On item in your questions and answers, you speak to nonstructural alternatives or one better said is no project alternatives. I've worked in the Delta since the early '80's. And in the early '90s, the Department of Water Resources came to one of my clients, through what's known as the South Delta Improvement Program down in the west Delta. This was known as Reclamation District Number 800 Byron Tract, which is just north of the Clifton Court Forebay. And through that South Delta Improvement Program, there was a series of representations as to what they were going to do to improve conveyance to the forebay to get better conveyance and capacity. Meanwhile, at the end of that kind of ten-year period, they came to the reclamation district and said, you know, the real impact of pumping is the fish impacts. And they proposed a stream up on the north side of Clifton Court Forebay that was going to allow for sweeping flows and taking care of the fish impact. So I'd like to see that being brought back in. It was dropped without any real explanation. We worked very seriously on negotiating the terms and conditions of a right of entry and so forth.

339	Chris Neudeck Kjeldsen, Sinnock & Neudeck	The second alternative I would like to have looked at as well, if we're talking about alternatives, two alignments that are next to each other really aren't alternatives. They're still in the Delta. You've taken that -- the purple one and thrown it in as a discussion item. What we really need to do is look outside the Delta. Maybe look to the west Delta. So I'd ask that be considered as well.
340	Dan Nomellini, Jr. Central Delta Water Agency	…the first is a predetermination. I believe you need to have your head -- your head has been in the sand if you think the decision has not already been made to build a tunnel. And that's sad, because, as we all know, there's a lot of ways that reliability can be improved with the existing system, and that money can be used in a lot better places. So that's unfortunate.
340	Dan Nomellini, Jr. Central Delta Water Agency	And I would suggest that you include alternatives that will ensure that not one drop of water is exported that is needed to maintain adequate Delta water quality. Now, to us, that means you need non-tunnel alternatives, and a lot of them.
341	Dante John Nomellini, Sr. Central Delta Water Agency	Did I hear you correctly, that you are going to consider alternatives that don't include a tunnel?
343	Margo Praus Sierra Club of California Member	But, most importantly, include a no tunnel alternative as well; and perhaps give some thought to a desalination project or two or three for California. We do have an extensive coastline.
344	Julia Rapoza Sustainable Stockton	I wanted to know what other sources of water have you considered besides the Delta…I take it, that means, you don't have any other ideas?
349	David Scatena	I suggest that the money that is to be spent should be spent on projects that produce more water, like desalinization, water conservation effects, and the planting of less nut trees in our state.
350	Brandon Dawson Sierra Club of California	So we ask that the EIR thoroughly consider a no tunnel alternative and the state's use of investment in local programs in Southern California and all over the state that reduce measures that take away water from the Delta, as well as state investment in restoring existing Delta levees and infrastructure.
352	Margie Fries San Joaquin County Climate Action Coalition and the Peace and Justice Network	One tunnel now proposed does not lessen the destruction the half, nor improve an already degraded Delta. We believe a priority of the Governor and the State of California is to protect public trust resources. The San Francisco Bay Delta and estuary is that resource. We support a no tunnel alternative.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze alternatives that would increase California Delta outflow and reduce water exports as compared to current conditions in the Delta. Specifically, the EIR must examine a "no tunnel" alternative.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful, more economical, and achieve the same water supply reliability goals and targets.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: • Impacts of various possible tunnel alignments

361	Brett Baker	In my 36 years, I don't think there's ever been a real open time or opportunity to actually discuss alternatives. It's nice that you guys present alternatives in your document, but I don't think that's actually ever been a viable discussion.
362	Donald Barnes (on behalf of Barbara Deaks, owner and operator of B7W Resort and Marina)	One of them happens to be, there's an ongoing effort to tear down dams here in California, when in fact they should be built. And this would probably being a good time, outside of the weather patterns, to start building dam projects, mainly to offer resources, water resources to Southern California.
362	Donald Barnes (on behalf of Barbara Deaks, owner and operator of B7W Resort and Marina)	And there's many other things that Southern California could do in addition to the desalinization, as someone mentioned earlier. I could go on and on, but I'm sure others have comments along the same lines. But in any event, I'm just offering some alternatives as to what can be done here in California.
364	Barbara Daly	Where are the studies on true viable alternatives, and where are they vetted? Why are you here with this monstrously bad plan again, determined to get your way, trample over this area, destroy the water here, as the saltwater would encroach farther into the Delta with this project, and, as the past EIR/EIS stated, that the people in the Delta abandon their homes and buildings during the construction phase.
367	Mark Goble	Concerned the tunnel will destroy the Delta; could the tunnel be above ground?
369	Douglas Hsia	Now I'd like to echo with James Motlow's comment today, which is about Congressman John Garamendi's leadership pickup plan, which is a – taking water from the Deep Water Channel at the intake near Rio Vista, and this is the bridge of our essential corridor. And I think that plan is good because – I think it is good because I think it will have much less impact on the environment, it's much less work, and it probably have a lot less – it takes away a lot of caution that the people show here.
370	Dr. Jeff Michael University of the Pacific, Eberhardt School of Business	I think it behooves you to consider consequences that are focused on a seismically resistant levee system. And in fact, another Department of Water Resources document, in 2008, submitted to the California state legislature, identified seismically resistant levees as one of three promising strategies to address this risk. Department of Water Resources has not done anything since then to investigate that, so I recommend that you consider that in your alternatives.
373	James Motlow	There is an alternative to this bad idea. John Garamendi has a proposal. Why this wasn't included in these proposals as another alternative, and why it has to wait to be included – and when alternatives are considered – is a mystery.
374	Tim Neuharth Steamboat Acres	Emily Pappalardo talked about Dr. Pike's western intakes concept. That's a dam viable alternative, if you ask me. But nobody's looking at it. We've got the same darn thing we started out in the first place. And it is wrong – it is the absolutely wrong place to take the intakes. If you have a through-Delta system that lets the Delta do its job environmentally, agriculturally and recreationally, then you got the right concept.
375	Russell Oans	Supports John Garamendi proposal.
376	Emily Pappalardo	So I would like to echo what Dr. Jeffrey Michaels said in looking at bringing up the levees to those seismic standards so that you look through a through-Delta Conveyance, given that we're already – the project

		proposal is for a dual conveyance option. So you have to look at the levees, no matter what option you're looking at. And furthermore, for the ten to 20 years we're gonna be fighting about this, the levees still need to be improved to keep conveying that water to the south. So you need the levees no matter what. Second, to look at capturing storm flows, I would suggest that you look at the – an intake on Sherman Island this was proposed by Dr. Bob Pike in the last go-around.
376	Emily Pappalardo	When you look at how you're going to study this EIR, it says we're using assumed operations. Operations are gonna be a huge impact to the Delta, so the only way to really control that is to control where the project goes.
377	Robert Pope	Seems like it'd be a much better plan to increase the size of storage and start shipping water from south of the Delta.
378	Greg Robinson	Your planned conveyance corridors run right through the Cosumnes River Preserve and could destroy it.
379	Nikki Seward	Concerned about how alternatives will be selected.
381	Peter Stone	Alternatives – there's the section in Alternatives: Viable other options from outside DWR should be considered, not just slight variations on the tunnel proposal." And where are those going to come from? I haven't seen evidence of where they're gonna be coming from.
381	Peter Stone	The intake facilities, it's talking about there might only be two facilities. And if only two intake facilities are to be constructed, it's recommended that the northernmost intake be the one eliminated. This will reduce the significant pile-driving noise for years, negatively impacting Delta Elementary Charter School in Clarksburg, which has many Special-Ed students who would be considered sensitive receptors and have very detrimental impacts to their education.
386	Carlin Black	I would very much like to see them use the conservation method instead of exporting water.
388	Brandon Dawson Sierra Club of California	The EIR needs to include a no-tunnel alternative that analyzes the state's use of and investment in local projects and programs relating to water conservation, efficiency, storm water capture and other measures that achieve the same water reliability and supply goals as the proposed project. These types of projects are both less environmentally harmful and less costly.
388	Brandon Dawson Sierra Club of California	This alternative should include an analysis of the state investment in restoring and strengthening existing Delta levees and infrastructure.
391	Meg Giberson	One thing I would like to see in the NOP for this tunnel project is that the no-tunnel alternative be thoroughly analyzed. And that would be not just a ceremonial analysis, not just a pro forma analysis, but a thorough analysis of a no-tunnel alternative.
392	Katja Irvin	As far as alternatives are concerned, I really support a really strong look at the no-tunnel alternative as other speakers have eloquently given reasons why the no-tunnel alternative is a very good alternative. But also a very strongly and unbiased consideration of the east-tunnel alternative.
395	Michael Frost	What can give us the most impact for the lowest amount of money, as quickly as possible? You know, these tunnels are going to – are going to be a stranded asset.

398	Stephen Rosenblum	The proposed single tunnel will extract the maximum of 6,000 cubic feet per second, and that's already a lot more than can be spared from the low flow that the Delta is presently getting.
398	Stephen Rosenblum	Instead the project should be directed more towards fixing the problems of the Delta to protect the existing – existing islands and shoring up the levees and to protect the water quality from saltwater intrusion. That is really one of the main issues of the collapse of the species, and this project will exacerbate it.
407	David Ogilvie	The message needs to be framed as "going back to the drawing board and seeing if a single tunnel conveyance system moving 6000 cfs makes sense". The message needs to be clear that the EIR is a new one and not borrowing information from the previous unless it's fully redundant. People are going to want to see all new alternatives including a "do-nothing" alternative. People are going to want see data that says the project is the best use of funds and resources instead of storage projects or other water saving/cleaning technology projects.
411	Anna Swenson	So I would like you to look into alternatives. Recycled water is a great alternative. Being water efficient is a great alternative. Dr. Gleick's plan is a great place to start. The Deep Water Ship Channel, another great place to start. But the tunnel is not the answer because you can never replace what you're going to take away. You can't mitigate it. And we do not want to be a catastrophic result of your mis planning.
414	Edward Cull	There is an organization called Billions of Change that helps people mostly in Africa and Asia with clean, healthy drinking water. The engineers have developed natural draft barges with desalination skids on them to be placed in the ocean, and they're very efficient. A lot of the equipment can be run on solar. What if we put these in the Monterey Bay. It is less than 50 miles to the San Luis Reservoir, there's not a lot of stuff in the way topography wise. And then all we got to do is pour just a few feet right under the 5, keep the aqueduct full during the lean years, LA gets their water. During the heavy years we can branch off the aqueduct, keep the aquifers filled in the San Joaquin Valley where everything is getting sunk under.
415	Molly Culton Sierra Club of California	Consider a no tunnel alternative that analyzes the states investment in local programs and projects relating to water conservation and efficiency measures that would achieve the same water reliability goals as well as invest in restoring and strengthening Delta levees. The state currently has numerous regulatory programs to improve air quality and water quality in low income and disadvantaged communities, reduce the state's energy footprint and greenhouse gas emissions, and reinvigorate California's biodiversity. The proposed project is antithetical to those programs. During and post construction, this project, whether operated to take 3,000 cfs, 6,000 cfs, or 7,500 cubic feet per second of desperately needed fresh water from the Delta ecosystem and its residents will worsen the air and water quality for Delta communities, increase the state's energy footprint as it facilitates more Delta exports and decimate much of the state's biodiversity, including among others, Sandhill cranes.
417	Barbara Daly	The tradeoff of agriculture in one part of California for agriculture in another area is a poor plan. A better way would be to encourage drip irrigation throughout agriculture in California.
418	Sonia Diermayer	I do formally request that you analyze alternatives that would increase Delta outflows and reduce exports. That you analyze conservation efficiency and the demand reduction measures that are already happening up and down the state, and if we project them into the future, they would probably make this project

		completely obsolete. The EIR needs to analyze, as you've also heard from others, the project's consistency with reduced reliance on the Delta. And you need to base the EIR on a real cost, real engineering, and real science. So the costs of the damage to the environment, the businesses, the cultural and historical integrity of these Delta communities, and the science needs to be peer reviewed and come from reputable scientists that are independent of political pressure.
424	Clarence Koi Sierra Club of California	Each year three quarters of the water that flows into the Delta, flows out through the Carquinez Straits. Only a quarter of that water that flows into the Delta is sent south. So we have a great source of fresh water that is now going out to San Joaquin – out of the Carquinez Straits. This problem was solved in 1929 by the Division of Water Resources, which proposed a salt water barrier one-and-a-half miles above Vallejo in the Carquinez Straits. This is in Bulletin 22, Division of Water Resources. That barrier was never built because it was considered that the flushing action from Shasta, Oroville, and so forth would be sufficient to keep the salt water at bay. Well, it was for a while, but it isn't anymore, but we still sent three quarters of the water out. This can be easily cured by putting in that salt water barrier. Then we can send double the amount south and still have half to input to flow out if we wanted to. So now is the time to put that salt water barrier in, and we can let both rivers flow freely down to the juncture of the San Joaquin and Sacramento, and then pump it from there, just like we do now.
425	Bill Martin	In your presentation, part of the slide – in the slide talking about purpose, you mentioned the cost effective manner. And so one of the requests I have relative to the coming documents is a clear analysis of costs. It appears to me that DWR is selecting a prepared – prepared to select a preferred alternative without any research into cost into the building of it and the operating of it. This tunnel project would not provide a single drop of new water. Conservation, recycling and reuse, and leak detection are currently the lowest cost ways to make better use of the water in today's system. So investments in these areas would permanently improvement the state's water budget.
427	Tim Neuhearth	I'm here to talk about the alternatives. Quite frankly, I am at a loss to think how that is being even considered here. I don't see any map showing any kind of alternative. We were at another meeting back in Hood last week, and all that they talked about was the tunnels and the launch pads and the – all different kinds of aspects of this thing; the dewatering, the pile driving, the roads, the traffic, so on and so forth. Nothing to do with any alternative at all whatsoever. So you people, DWR in particular, are charged with a fiduciary trust here with the public to consider alternatives, seriously consider alternatives. You have a responsibility for the Delta as a whole. There is over 700,000 acres of land in the primary zone of the Delta, considered many to be the most agricultural viable in the entire state, if not the nation. You need to – you have a responsibility to consider alternatives because of the fish and the wildlife, the ducks and the geese that are part of the Pacific Flyway. You have a responsibility to consider alternatives for the people of the Delta who live here and work here and produce – produce goods and services here. You have a responsibility to consider alternatives to the towns and communities of the Delta, to the agriculture aspect of the Delta, which contributes billions in goods and services in this state. You have a responsibility for the recreational users that number in the hundreds of thousands each and every year. And you have a final responsibility to the taxpayers of this state and the taxpayers of the nation, assuming you are going to get

		federal money, to be cost conscious, to do your cost, your analysis, your – to consider the alternatives that better suit what we're doing. We have been here for years, literally years, telling you that this tunnel thing does not work. We work here. We live here. My family that I represent has been here since 1848. We have seen a lot of water go down that river, and this tunnel thing is ridiculously beyond imagination in many, many aspects. And what I would like to know is, we had this peripheral canal thing back in the 80's go out on a state-wide vote, why are we not being able to vote on this on a statewide basis?
430	Robert Pyke	Mr. Pyke provided a handout on the benefits of the Western Delta Intakes Concept.
438	Dan Whaley	Is there going to be a risk assessment on how many people will die as a result of the construction or operation of this project? As we have heard, these tunnelling projects are dangerous and risky, with seismic problems, flooding problems. The basic starting point that this process should be is to maintain the existing levee system. Unless they maintain the existing levee system, any project that is built will ultimately fail. Southern California can get by without our water, and there can still be plenty of water for their Southern Cal – or for the Bakersfield farmers if they didn't pump water into the LA basin. Through conservation they can save that money – or that water at a reasonable expense. For instance, a low flow toilet saves five gallons. It would be less expensive to buy everyone in Los Angeles a new toilet and install it than to put this project, and with that there would be sufficient water.
439	Mark Wilson	There was at least three projects that I've heard about this evening, the saltwater barrier concept, the Western Delta intake concept, the no project concept with increased flows, and I would like to present a fourth one for you to study. One of the stated prime drivers of the proposed project is dealing with sea level rise. And the location of a project goes directly into the projected useful life a project. So the alternative I would like to propose is that you combine the project with the Sacramento Weir Widening Project that Sacramento Area Flood Control Agency is doing, and also combine it with a North Bay Aqueduct Relocation Project. This location would extend the useful life of the project because it's at a higher elevation. It would have broader regional benefits. It would use much existing infrastructure and reduce project costs and operations and maintenance costs. It could use the Deep Water Ship Channel or above ground or shallow barrier pipeline in the bypass. By the way, a bypass – the bypass is an area where we occasionally do have excess water, water that's excess of the needs of our system. It would be a shorter distance to tunnel under Suisun Bay to Clifton Court Forebay, and tunnel muck could be loaded on the barges. It may be possible to have multiple shallow burial pipelines at the bottom of Suisun Bay to give a redundancy factor to that – a redundancy factor that is engineered for seismic resilience. Gravity still is a feature of this project, but active pumping could be added for greater delivery efficiency. The Sacramento Weir site is just below the confluence of the feather in Sacramento Rivers. Stored water release from Oroville Dam would be much closer to its pumping facility, resulting in much less loss of carriage water. It's much more likely that you would be able to entice federal partners to join you with this less expensive and more reliable project with a much longer project life. This project proposal would be faster to get online. With the savings and project costs, the participating agencies could spend more on surface storage and other water supply resilience projects in line with the governor – with Governor Newsom's Water Resiliency Program.

448	Molly Culton Sierra Club of California	I'm speaking on behalf of Sierra Club of California and our more than half a million members and supporters statewide. This project will have detrimental impact on California salmon population that many indigenous and nonindigenous communities depend on. Capturing and averting more fresh water from an already collapsing ecosystem will only worsen conditions and will not provide the project proponents with any new water that is beneficial or cheaper. As such, we encourage your department to ensure that the EIR thoroughly consider a no tunnel alternative that analyzes the state's use of and investment in local programs and projects relating to water conservation and efficiency measures along with others that achieve the same water reliability goals and expend less energy as the proposed project. Doing so will ensure that enough water continues to run through the ecosystem so that communities that depend on these ecosystems will once again have the opportunity to thrive.
453	Morningstar Gali	I am Ajumawi Band of Pit River. I just want to say greetings to all of the relatives here tonight. I see Pit River, Wintu, Yurok, Hoopa relatives and all of you, and I just want to say how beautiful it is to have you all here. It's unfortunate that we're here. I am in opposition of the project, but since we are here to give comments, I have comments on what the EIR should be including. The EIR should analyze impacts to California salmon people, including salmon-dependent tribes and coastal fishing communities. The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a no tunnel alternative as mentioned earlier. The EIR should analyze the impacts to source waters and their reservoir storage, which do include the rivers that we all know where our water comes from. As salmon people as tribal people here that we know where our rivers are, the Trinity, the Klamath, the Sacramento, the Pit River, the McCloud. Like this is our water, and this is our water for our future generations that we haven't had salmon within our Pit River for 80 years now. That's four generations of our relatives of our peoples, and so for our generations, for our future generations that we need to be able to restore this, and so for the Feather, Yuba and San Joaquin Rivers, water quality impacts from an increased diversion should be included in this analysis. The EIR should analyze the cumulative impacts of the Delta Tunnels with the new Trump administration biological opinions for the Trump Water Plans, the long-term operations of the state water project, the Shasta Dam raise and the proposed site reservoir. Would these new projects then be used to fill the tunnels, and the EIR should analyze water conservation efficiency and additional demand, reduction measures that would be less environmentally harmful and more economical than the tunnels and achieve the same water supply reliability goals and targets.
456	Will Harling Mid Klamath Watershed Council	I want you to consider the no tunnel alternative
466	Joanne Lee California Indian Environmental Alliance	This document limits the possibility for health surface and ground water can be enhanced by restoration and enhancement of natural system. It largely focuses on how much water can be stored and diverted instead of focusing on how Upland Meadows slowly meandering streams and rivers supported by wide riparian zones and wetlands could greatly enhance ground water sequestration and surface water slowing. The reintroduction of species such as beaver and other traditionally cultural important species in strategic

		areas would assist us in naturally slowing water after seasonal rains providing water and wildland for fire protection and cooling water for fish.
473	Luda Miller	I've identified six reservoirs in Southern California that could contribute water towards the Westlands Water District. Westlands Water District is the largest water district within our country. As a taxpayer, I'm ticked off that we are supporting a multimillion or billion dollar corporation in order – we're funding them, and we get nothing back for this.
477	Janice Powell Mayor, City of Shasta Lake	I did not see anything in the NOP that shows any other alternatives instead of a tunnel. You can ask Chief Sisk of the Winnemem Wintu. They have other alternatives, and the state never seems to recognize that. They are traditional water keepers. They know more than we do, so I think they need a place at the table.
486	Tom Stokey Save California Salmon	I would ask you in your environmental document to include analysis of the California Environmental Water Caucuses Water Solutions Now as an alternative to the tunnels. There are plenty of other solutions to provide reliable water supply to Southern California cities such as recycling, conservation, storm water capture, and in fact, if you did a reasonable and a honest cost-effective analysis – cost-benefit analysis, you would find that they're much more cost-effective than this project.
487	Malissa Tayaba	The ITR Report recommended the eastern corridor, which is directly across from a wildlife refugee and very culturally sensitive area. All of the plants and animals will be in jeopardy. Where is Fish and Wild Life? When do we get to hear from them? We should have more talks about how to avoid this project, and can you guys say with scientific certainty that it will work and why? Maybe we just need to come up with more plans on how to conserve water. The health and preservation of the ecosystem is something that not only tribal people benefit from but all California residents.
488	Frank Toriello We Advocate through Environmental Review (WATER)	The EIR should analyze water conservation, efficiency and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets that the tunnel project proposes.
489	Jack Trout	We need to think of resolutions where communities that are south of us can fend for their own water, okay. This is the only way that we can control population. And by making them rely on building their own reservoirs, their own catch pots for water storage, that – that is the only solution.
492	Jacklyn Shaw	It would be "Devastating" Drought recycles to Dust Bowl from Delta if any tunnel, as stated by the Supervisors Coalition of Five Delta Counties. (So why were votes lost from this area?) Where is regional responsibility? For Delta, it is only negotiable for Delta River west. That is if any wet season after increasing drought recycles, to keep agreements. Further, San Francisco has a Desalination plant, but it has to be used every day, according to a water engineer. Likewise, Fresno County's regional responsibility best reclaim HETCH HETCH HETCHY and "FRIANT" dam. Moreover, Desalination grants are due to California, where it was researched/invented at UCB with J. Leibovitz, Ph.D, 1977. It has since been used in over 100 nations. Time is a wasting for California.
499	Jacklyn Shaw	San Francisco has DESALINATION plants to use every day, and Port of Oakland must do the same. Desal was invented at UCB, with J. Leibovitz, Ph.D., 1977 and since used in 100 nations. California had warranted

		grants from DOI and Bureau of Reclamation –for Desalination, which costs less than construction, displacing generational agricultural families or small family business.
503	Michael Brodsky Save the California Delta Alliance	The stated project objectives are, one, to mitigate the risk of levee failure in an earthquake which would cause salt water rush in and endanger water supply. The alternatives to a tunnel. And is a common sense answer of strengthening the levees, including more setback levees in the channel margin habitat that have an environmental benefit and a dual benefit of protecting water supplies.
503	Michael Brodsky Save the California Delta Alliance	The second objective of the project is to mitigate sea level rise caused by climate change. That can be mitigated in several ways. The most obvious of which is to allow more fresh water to flow through the Delta and out to sea to push back salt water. And where does that water come from? It comes from stopping exporting water over the Tehachapi Mountains, which also achieves the project objective of making the SWP deliveries more reliable. They're not reliable because you promised too much water in too many places. Why do we stop at over the Tehachapi? Because the State Water Project consumes all of the electricity generated by all of the California's hydroelectric dams, plus 4 or 5 billion kilowatts of gas-fired carbon-emitting power every year. The State Water Project is a climate atrocity. Gavin Newsom has to face up to that. You are required by the Public Trust Doctrine to exercise a continuing duty of supervision in the public interest, and it's obvious that the place of use in your water rights permits south of the Tehachapi Mountains must be amended so that that place of use is eliminated. So one of the portfolio ordinates will contain a planned retreat from exports south of the Tehachapi Mountains, phased out over ten years.
503	Michael Brodsky Save the California Delta Alliance	Other elements that are included that do not include a tunnel, as I mentioned before, would be flooding some of the island. Some of the island the levees can be strengthened. Others, they can be sacrificed, and those islands can be flooded for habitat, and also as a barrier to saltwater intrusion.
504	Supervisor Diane Burgis Contra Costa County	We need to invest in projects that are going to create water. That are not going to take water. And I have had discussions with people that are working to get this project and when I said, Why do you want to take the water so high? They said, Because it tastes better. Why can't we do something where we don't destroy the Delta and we can still take care of our state? There are other options, and when we talk about the no tunnel option, we want that considered.
507	James Cox California Striped Bass Association	This plan does not have less reliance of Delta. If anything, it's more reliant on Delta water. There were many plans that had alternatives to pumping out of the Delta. Local water, local supplies for water, recycling of water, capture of rainwater. All of these would give us long-term solutions rather than a short-term solution, which is what the tunnel project really is. We live in the high-tech capital of the world but, yet, we can't come up with a solution that uses any kind of engineering or any kind of technology that isn't close to a century old. I think we can do better than this, and I think the Delta deserves it. And the people who live in the Delta deserve their home to not be just a collection for water.
508	Molly Culton Sierra Club of California	We object to both alignments of the proposed project. The central alignment will decimate natural habitats for wildlife and land that have provided quality farming and livelihood for Delta communities for decades. And the eastern alignment provides a significant number of increased vermin impact for all Delta residents. Especially those living near the Port of Stockton. Both alignments will worsen the earth quality, increase

		pollution in Delta communities and provide no benefits for anyone other than the large farming operations south of the Delta. So we ask that the EIR thoroughly consider a no tunnel alternative that analyzes the state's use of an investment in local programs and projects relating to water conservation and efficiency measures, along with others that achieve the same water reliability goals, and expend less energy as the proposed project. The analysis should include potential safe investment in restoring and strengthening existing Delta levees and infrastructures. This, along with increasing fresh water flows in the Delta, is a less environmentally destructive and less costly option that meets the state's objective of mitigating damage from seismic activity and impacts from salt water intrusion.
512	Mike Guzzaroo	I mentioned some alternatives earlier: regional self-sufficiency, storage, water storage. I can't see why the governor is looking at this project, unless he's got something personal to gain from it. It's a dangerous project any way you look at it. The science doesn't back doing this over the other23 alternatives.
514	Jan McCleery	The EIR should study as an alternative to a tunnel a plan to treat from it23 exporting Delta water over the Tehachapi, replacing the water with new sources from desalination, recycling, conservation, replacing lawns with drought resistant landscaping. In other words, LA should reduce reliance on the Delta through improved regional self-reliance, which is a requirement of the Delta plan. Replacing lawns with better landscaping in LA would take more water but is manually diverted from the Delta. Common sense. Alternative likes these and groundwater replenishment would allow more water to flow through the Delta, keep the salt water at bay, and, if needed, for the Brentwood sweet white corn, our cherries, our Delta farms, and it's – the Delta needs more fresh water flowing through it, not less. So we say no tunnel. One tunnel is one too many.
518	Mariah Looney Restore the Delta	Consider a no-tunnel alternative. The proposed alignments would destroy the Delta. Both tunnel alignment proposals are inadequate and do not offer equity to Delta legacy communities or to south Stockton.
520	Tim McCabe	Desalinate Los Angeles, like they did in San Diego.
522	Frank Morgan	I'd like to hear about alternatives. I like the desalination alternative. You can do desalination plans all down the coast of California, stick the straw in the ocean. If you did desalination, that's not reconveyance. No tunnel.
525	Ray Qualls	I'd like to hear about alternatives.
529	Robert Pyke	I hope it's not too late to listen to public input on new ideas.
531	Paul Seger	Look at mandating water rates structures that create conservation at a level that is unheard of, that is absolutely necessary in order to maintain a sustainable water culture for California. There are other projects that can work along with consuming medium amounts of water that allows people to live healthy, constructive lives. Do a comprehensive study regarding a tiered rate structure that incentivizes water conservation of water at all levels – urban water and agricultural uses.
532	Carla Sign	Look at desalination and water storage.
535	Vince Vargas	Talk about rising sea levels and using ways to convert that to fresh water. There are alternatives. We have an abundance of shoreline. We have a Bay Area that has salt in it

536	Jerry Willis	I'd like to see the crosscut channel shut off completely in the Delta. Then build dams for cheaper electricity, entertainment for resorts, etc. We could produce 5 to 9 billion-acre feet a year and dump it on the east side of the Delta without dragging from the west side to the east side.
537	Patricia Ziobro	Look at a permanent solution to this problem. Desalination is a permanent fix that doesn't depend on how much water we get from rainfall.
538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	My comments focus on two critical areas where DWR appears to be repeating their mistakes of their past despite the Newsom administration's stated intention of taking a fresh approach: 2) ignoring known alternatives with higher and more broadly distributed benefits and likely lower costs.
538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	The decision to ignore levees strengthening in the alternatives developed to protect from this disaster is unethical on its face, but it is made far worse by unethical actions taken by DWR under previous administrations to mislead the public and the legislature about levee strengthening as an alternative. In fact, DWR identified seismic levee strengthening in a 2008 report to the legislature in response to AB 1200 as one of 3 promising alternatives to the issue of Delta levee risk –an action that in and of itself would seem to require seismically improved levees as an EIR alternative. Four years later, in response to a public records request for the 2007 consultants report, it became apparent that DWR had suppressed and altered their consultant's report that had actually identified the seismic levee improvement strategy as having the highest economic benefits and lowest implementation costs for the state. In addition, after inspecting the suppressed2007 DRMS 2 consultants report in 2011, it became clear that DWR staff had actually altered the results in its 2008 report to the legislature in response to AB 1200, and reversed the rankings of alternatives to put Delta isolated conveyance first and seismic levee improvements last when the researchers had actually given the state the opposite findings. Specifically, the 2008 AB 1200 report stated that "These rankings were developed by DWR and DFG staff based on DRMS analyses, with adjustments based on the BDCP analyses. "Quantitative results from DRMS Phase 2 were not released until June 2011, and in the June 2011 report seismically improved levees had been removed from the strategies despite being identified as one of the three most promising strategies in the 2008 report to the legislature. Had DWR behaved ethically and presented the legislature with unaltered results of the DRMS Phase 2 analysis in 2008, rather than staff making "adjustments based on the BDCP", the State's risk reduction policy for the Delta may have taken a very different course. Today, the Department of Water Resources has the opportunity to correct this ethical error from its past under previous leadership, and properly consider seismic levee strengthening as an alternative in its single-tunnel analysis.
538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	It is also worth pointing out a few benefits of a seismically-resilient levee system to water exporters compared to a single-tunnel. A single-tunnel only protects a portion of Delta exports in the earthquake scenario, whereas a resilient levee system protects 100% of Delta exports from the earthquake Levee system improvements yield immediate benefits as each section of improvements is completed, whereas the tunnel does not have any value until the entire system is complete –a construction process expected to take decades. The costs of a seismically-resilient levee system are likely lower than a tunnel, and more importantly can be shared with the pubic and other entities because there are a broad array of beneficiaries.

538	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	While my comments about alternatives are about the levee system, I also strongly suggest the consideration of alternative technologies and intake locations in the west Delta. While water quality is poor in the West Delta at certain times of year, the tunnels would be shorter and less expensive to build and the capacity of the intakes could be increased to take better advantage of high flow events. I strongly endorse comments from others that will undoubtedly discuss this in more detail.
539	Michael Brodsky Save the California Delta Alliance	A revised NOP should provide for a Natural Systems Alternative that reduces exports in order to provide more water for through-Delta seaward flow and includes strengthening and restoring Delta levees through the use of setback levees and channel margin habitat. This approach will achieve the project objectives of mitigating saltwater intrusion from climate-induced sea level rise and mitigating the risk of salt water intrusion from catastrophic levee failure. It will also achieve the project objectives of providing operational flexibility to improve aquatic conditions in the Delta and of protecting the ability of the SWP and CVP1 to reliably deliver water. It is superior to a tunnel with regard to project objectives and without the significant adverse environmental impacts of a tunnel. The Natural Systems Alternative should therefore be the preferred alternative pursuant to CEQA.
539	Michael Brodsky Save the California Delta Alliance	Strengthening the levees and at the same time utilizing setback levees with channel margin habitat is the proper response to saltwater intrusion from seismic risk. Although set in a heavily altered system, restored setback levees implement the requirements of Public Resources Code section 71154 for "using natural ecological systems or processes to reduce vulnerability to climate change related hazards, or other related climate change effects, while increasing the long-term adaptive capacity of coastal and inland areas by perpetuating or restoring ecosystem services." (Pub. Res. Code § 71154, subd. (c)(3).) Specifically, "levees that are combined with restored natural systems … provide a wide array of benefits to people and wildlife." (Id.) A wholly artificial tunnel, on the other hand, is not consistent with state policy on climate change adaptation as codified section 71154.
539	Michael Brodsky Save the California Delta Alliance	Public Resources Code section 71154 is binding on all state agencies and requires that when state agencies are taking steps to adapt to climate change, in particular the development of new infrastructure, they develop an alternative that utilizes existing natural features rather than constructing large new artificial infrastructure. When developing infrastructure to address [climate] adaptation, where feasible, a project alternative should be developed that utilizes existing natural features and ecosystem processes or the restoration of natural features and ecosystem processes to meet the project's goals. For purposes of this subdivision, "natural infrastructure" means using natural ecological systems or processes to reduce vulnerability to climate change related hazards, or other related climate change effects, while increasing the long-term adaptive capacity of coastal and inland areas by perpetuating or restoring ecosystem services ... [including] levees that are combined with restored natural systems, to provide clean water, conserve ecosystem values and functions, and provide a wide array of benefits to people and wildlife.(Pub. Res. Code §§ 71154, subd. (c)(2) & (3).)State agencies adapting to climate change are also required, to the maximum extent practicable, to "Protect[] and enhance habitat, species strongholds, and wildlife corridors that are critical to the preservation of species that are at risk from the consequences of climate change." (Pub. Res. Code § 71154, subd. (g).) The single-tunnel project is proffered to "address anticipated rising sea

		levels and other reasonably foreseeable consequences of climate change and extreme weather events," (NOP, p.2), and is therefore subject to section 71154. Read together with CEQA, section 71154 requires that DWR develop a non-tunnel Natural Systems Alternative for full study in any Environmental Impact Report ("EIR") culminating from the NOP in order to comply with CEQA's mandate to study a reasonable range of alternatives. We believe that the Natural Systems Alternative should be the preferred project.
539	Michael Brodsky Save the California Delta Alliance	The Natural Systems Alternative. First, strengthen Delta Levees and use setback levees and channel margin habitat at critical and feasible locations. Setback levees with channel margin habitat are feasible and cost-effective, at a cost of $14 million or less per mile. (See, e.g., West Sacramento Setback Levee Project, https://www.cityofwestsacramento.org/government/departments/community-development/flood-protection/levee-projects-overview, last visited April 14, 2020.). Where set back levees are not practical, strengthening conventional levees would be much less costly per mile. For example, 4.7 miles of levee on Bouldin Island were recently strengthened at a cost of $3 million per mile. (http://www.mwdh2o.com/DocSvcsPubs/Delta_Islands/, last visited April 15, 2020.) An adequate portion the Delta's approximately 1100 miles of levees could be replaced or strengthened for far less than the $15 billion plus or minus price tag of a single tunnel. A tunnel mitigates levee failure risk only as to exported water supplies but ignores catastrophic damage to the Delta ecosystem and loss of fresh water supply to in-Delta users, including Delta communities and farms. Restored levees protect export supplies, in-Delta users, and not only protect the Delta ecosystem but greatly enhance it. Restored levees, using setback levees in locations where feasible, are consistent with Delta Plan Recommendations: Setting levees back from the riverbank can expand flood conveyance capacity and reduce flood risk while providing ecosystem restoration and recreational opportunities. Setback levees also allow opportunities for construction of an improved levee foundation and section using modern design and construction practices, thereby reducing risk of failure. Integrating fish-and-wildlife-friendly channel margin treatments into levee improvements can also help. (Delta Plan, Chapter 7, as amended March 2020 , p.21.)The Natural Systems Alternative might also consider flooding of selected Delta Islands. Intentionally breeching levees at some locations can mitigate the threat of future unplanned catastrophic levee failure in an earthquake and also create additional freshwater storage and habitat, serving the twin goals of ecosystem restoration and water system reliability. Although requiring careful study and planning before acceptance of any future project, freshwater storage on flooded Delta Islands has been found feasible and cost-effective in the past. (http://www.semitropic.com/pdfs/Delta%20Welands%20project%20EIR/209629-delta-wetlands-feir-20110817%20permissions.pdf, last visited April 15, 2020.)
539	Michael Brodsky Save the California Delta Alliance	Second, implement a planned retreat from exporting of Delta water south of the Tehachapi Mountains. Replacing Delta water exported to the Metropolitan Water District with new local and regional supplies is feasible and cost-effective. Credible estimates of the cost of water delivered from the late WaterFix tunnel project ranged from about $2400 to well over $5,000 per acre foot. The Natural Resources Defense Council estimated the cost at $2361 per acre foot. (Doug Obegi, MWD's WaterFix Cost Assessment is Inaccurate and Inadequate, August 11, 2017 [Attachment 2].) The Final WaterFix EIR estimated the yield of WaterFix at 172,000-acre feet per year. Dr. Rodney T. Smith, of Stratecon, Inc., produced a table analyzing WaterFix cost per acre foot at a range of yields. For 200,000-acre feet per year, the cost would be between $4795 and

$8463 per acre foot, depending on the assumed risk premium. For 100,000-acre feet per year, the cost would be over $9500 per acre foot. (Rodney T Smith, Impact of the Annual Yield of the Twin Tunnels Project on the Cost of Project Water, August 30, 2016 [Attachment 3].) There is no reason to believe that a new single tunnel project could deliver water more cheaply than the former WaterFix projections. From 2012 to 2016, an average of about 1,095,000-acre feet per year of SWP water was delivered to Southern California. (Bulletin 132-17, table B5-B.) Even assuming that half of Delta deliveries would be foreclosed without a tunnel (a scenario not supported by evidence, but apparently part of contract amendment negotiations) the cost per acre foot for a tunnel project would be over $2,000 per acre foot utilizing Dr. Smith's former WaterFix projections. Any credible cost estimate for single tunnel delivered water will make numerous other sources of supply more cost-effective than a tunnel. Costs for replacing exported Delta water with local and regional supplies in Southern California would be less per acre-foot than supplies delivered through a single tunnel project. DWR estimated the mid-point cost for municipal recycled water as $800 per acre foot. (DWR, California Water Plan 2013.) The WateReuse Research Foundation has estimated the following costs for water supply alternatives per acre foot: direct potable re-use $820–$2000; indirect potable re-use $820–$2000; seawater desalination $1500–$2300; water use efficiency and conservation $495–980. (WaterReuse Research Foundation, The Opportunities and Economics of Direct Potable Reuse (2014).) The Metropolitan Water District of Southern California's 2015 Urban Water Management Plan identifies specific potential recycling projects with a yield of 680,000-acre feet per year but none of those projects are included in Met's projected supply figures. Met consistently overstates demand and understates local and regional supply potential in order to justify continued demand on Delta Water. (See, e.g., Issue Brief, Mismatched, Natural Resources Defense Council 2017.) The untapped potential for stormwater capture in Southern California is at least 300,000 acre-feet per year. (See The Untapped Potential of California's Water Supply: Efficiency, Reuse, and Stormwater Capture, NRDC and Pacific Institute 2014; see also Testimony of Doug Obegi before the State Water Resources Control Board for unpublished county-by-county data, available www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/exhibits/nrdc.html.) The Southern California Water Coalition conducted a survey of stormwater capture projects in Southern California and found that the median cost per acre foot was $1070. In the aggregate, for all the projects surveyed, there was a cost of $132 million for a yield of 13,400-acre feet annually, or a cost of $328 per acre foot over a 30 year period. (SCWC Stormwater Task Force, 2018 WhitePaper Update, available www.socalwater.org/wp-content/uploads/scwc-2018-stormwater-whitepaper_75220.pdf, last visited April 16, 2020.) Met has placed the cost of water savings through turf replacement at $600 per acre foot. (http://mwdh2o.com/PDF_Newsroom/Turf_Removal_Program.pdf, last visited April 16, 2020.) Turf replacement, encouraging homeowners and businesses to replace thirsty green lawns with water-efficient landscaping, is perhaps one of the biggest untapped, cost-effective, sources of new water in Southern California. No data were found to indicate the total potential for turf replacement at this writing. Extrapolating from Met's figures, approximately one-acre foot per year is saved for every 7400 square feet of turf replaced. With a service area of 5200 square miles, populated with millions upon millions of detached single-family homes, and businesses, sprouting lush lawns, the potential must be at least in the

		hundreds of thousands of acre feet per year. If they do not exist, accurate figures for this potential should be developed. If DWR has information as to the potential for turf replacement, Delta Alliance would appreciate the provision of those figures in response to these comments. Substantial new water is also available in Southern California through better indoor water conservation rebate and incentive programs, which are also currently limited in budget and application. Estimates range from 1.4 to 2.4 million acre-feet of new water annually from untapped urban water conservation measures, including indoor measures and outdoor measures in the South Coast Hydrologic Region, most of which is comprised of Met's service area. (See The Untapped Potential of California's Water Supply: Efficiency, Reuse, and Stormwater Capture, NRDC and Pacific Institute 2014; see also Testimony of Doug Obegi before the State Water Resources Control Board for unpublished county-by-county data, available www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/exhibits/nrdc.html.) Desalination technology is improving, and with advances in brine management, provides an additional, essentially unlimited, source of regional supply. From 2012 through 2016, Met received an average of about 830,000-acre feet of SWP supplies per year. (Bulletin 132-17, table B-5B.) There can be little doubt that it is feasible to replace Met's SWP supplies with local and regional supplies that are cost effective, without the environmental damage to the Delta, and that are not wildly energy intensive as is pushing trillions of tons of water over a mountain range.
539	Michael Brodsky Save the California Delta Alliance	The Public Trust Doctrine Requires DWR To Consider Phasing Out Exports South Of The Tehachapi Mountains. DWR has an affirmative duty to perform a public trust analysis of any tunnel project, which involves considerations beyond those required by CEQA. (See, e.g. California WaterFix Findings of Fact and Statement of Overriding Considerations, Part IV, Findings Regarding the Public Trust Doctrine.) Even absent a new project, tunnel or otherwise, DWR has an ongoing duty of supervision to consider public trust principles in managing water resources. DWR's water rights, in particular as to place of use in Southern California, are not vested. DWR must consider changes in the allocation of water resources when new information makes a renewed public trust analysis appropriate: The public trust doctrine and the appropriative water rights system are parts of an integrated system of water law. The public trust doctrine serves the function in that integrated system of preserving the continuing sovereign power of the state to protect public trust uses, a power which precludes anyone from acquiring a vested right to harm the public trust, and imposes a continuing duty on the state to take such uses into account in allocating water resources.(National Audubon Society v. Superior Court(1983) 33 Cal.3d 419, 452.) In particular, past allocation decisions may need to be revised in light of new information: Once the state has approved an appropriation, the public trust imposes a duty of continuing supervision over the taking and use of the appropriated water. In exercising its sovereign power to allocate water resources in the public interest, the state is not confined by past allocation decisions which may be incorrect in light of current knowledge or inconsistent with current needs.(National Audubon, 33 Cal.3d at 447.) Contract provisions designating delivery to Southern California SWP contractors and DWR's water rights permits designating place of use in Southern California must give way to public trust considerations where a public trust analysis demonstrates that protection of public trust resources is feasible and reducing or eliminating diversions is in the public interest. The "state must bear in mind its duty as trustee to consider the effect of the taking on

		the public trust, and to preserve, so far as consistent with the public interest, the uses protected by the trust." (National Audubon, 33 Cal.3d at 446-447, citations omitted.) "The state accordingly has the power to reconsider allocation decisions even though those decisions were made after due consideration of their effect on the public trust. The case for reconsidering a particular decision, however, is even stronger when that decision failed to weigh and consider public trust uses." (National Audubon, 33 Cal.3d at 447.) Here, there is no doubt that ongoing diversions of Delta water to supply Southern California significantly harm public trust resources in the Delta, including driving several fish species to the brink of extinction. The Delta ecosystem is in crisis. There are multiple stressors but it is beyond dispute that lack of freshwater flow through the Delta, caused by excessive exports, is the master stressor that needs to be addressed before ecosystem recovery will be possible. (See, e.g., August 26, 2014, Letter from USEPA Administrator Jared Blumenfeld to National Marine Fisheries Service Administrator Will Stelle, p.2; Delta Plan, p. ES-2; State Water Resources Control Board, Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem, p. 2 ["The best available science suggests that current flows are insufficient to protect public trust resources"]; p.5 ["Recent Delta flows are insufficient to support native Delta fishes ... . Flow modification is one of the immediate actions available" to address ecosystem decline].) But the need to protect public trust resources in the Delta must be balanced against the consumptive needs of Southern California. "As a matter of practical necessity the state may have to approve appropriations despite foreseeable harm to public trust uses." (National Audubon, 33 Cal.3d at 446.) However, the public interest balance has changed significantly in recent years due to three factors: 1) Increasing awareness as to the availability of feasible, cost effective, alternative supplies that do not harm public trust resources; 2) The awareness of climate change and the energy / GHG impacts of exporting water over the Tehachapi Mountains; and 3) The dramatic worsening of Delta ecosystem decline. At one time in history, perhaps when the Edmonston Pumping Plant went into operation in 1972, a public interest balancing may have favored continued exports. The Delta ecosystem was not yet in catastrophic decline, technology for alternative sources of water was not yet developed, and the climate impacts of enormously energy intensive pumping were not understood. The societal good of supplying water might have outweighed impacts on the Delta ecosystem—so far as those impacts were understood. However, we know today that the public interest counterbalance of supplying water to Southern California is obliterated by the climate impacts of pumping that water over the Tehachapi Mountains, especially in light of far more energy efficient and cost-effective sources of water. There is no longer any public good to weigh against the need to reduce harm to the Delta ecosystem as the benefit to society of exported water is canceled out by the climate impacts of export pumping. Any public trust analysis culminating from the NOP should fully consider phasing out exports to Met.
539	Michael Brodsky Save the California Delta Alliance	Locating Intakes At Former WaterFix Locations, And A Through-Delta Tunnel Route Violate The Delta Reform Act, Are Inconsistent With The Delta Plan, Violate California Constitution Article X, Section 2, And Offend Principles Of Environmental Justice. The NOP continues to limit intake location to one of three former WaterFix intake sites. We know from conclusive evidence developed in the former WaterFix proceedings that the massive concentrated construction impacts associated with intake siting in this location place enormous and unreasonable stress on the nearby Delta legacy communities, including Hood,

		Clarksburg, and Locke. The massive size of the intake(s) at this location is an unreasonable method of diversion. California Constitution, Article X, section 2, expressly prohibits any "unreasonable method of diversion of water." The NOP violates this provision of our state constitution. Delta Plan Policy DP P2 (23 CCR §5011) requires that DWR "Respect Local Land Use When Siting Water or Flood Facilities or Restoration Habitats." Extensive evidence developed during the State Water Resources Control Board and Delta Stewardship Council Proceedings for the former WaterFix shows that it is not feasible to site intakes in these locations consistent with Policy DP P2. Hood is a largely low income and minority community that would bear the brunt of intake impacts, including increased air pollution from diesel exhaust associated with construction activities. Locating intakes as shown in the NOP is not consistent with environmental justice principles expressed in Government Code section 65040.12. DWR continues to push for intake siting near these legacy communities not because of any physical advantage to locating intakes here but because it believes it retains an antiquated water right for a point of diversion. Siting an intake here would, on DWR's belief, require only a petition for a change in the point of diversion and would not initiate a new water right. However, this is not a legitimate justification for placing intakes in an unreasonable manner. Intake location should be considered based on minimal impact to Delta communities and locations not included in the current NOP need to be open for consideration. Finally, it has been conclusively proven through extensive evidence introduced in the former WaterFix proceedings that a tunnel route through the Delta is not feasible. Impacts on Delta recreation and navigation of a through-Delta route are unacceptable. It is a waste of time and money to continue to pursue a through-Delta tunnel route as shown on the NOP. Attachment 4 hereto is a slide show presented to the Delta Stewardship Council during the former WaterFix proceedings summarizing some of the evidence showing that the intakes cannot be located as shown on the NOP and that a through-Delta tunnel route is not an option.
539	Michael Brodsky Save the California Delta Alliance	The NOP should be redrafted to provide for a Natural Systems Alternative that includes phasing out exports of Delta water to the Metropolitan Water District, strengthened levees, and increased through Delta seaward flow to manage salinity intrusion and recover the Delta ecosystem. Intake locations at the sites of former WaterFix intakes and any through-Delta tunnel route should be eliminated from consideration now.
540	Cheryl Madrigal Rincon Band of Luiseño Indians	The proposed project will have a tremendous impact on waterways throughout California. While the Band understands that the areas directly impacted will be in northern and central California, the Band is concerned that the proposed project will lead to unforeseeable impacts through the whole state. The Rincon Band recommends to consider alternative strategies to secure future water supply without such drastic development proposals.
542	Bruce Campbell	Include a no-tunnel alternative which is current Delta management without a tunnel. Offer an alternative that can achieve reliability in water deliveries but which does so without mammoth construction costs. This alternative should focus on investing in water conservation and efficiency, accompanied by other water demand reduction measures.
542	Bruce Campbell	Please discuss which of the alternatives that you will offer in the DEIR would involve additional pumping of Trinity System water over to the Sacramento watershed, involve raising Shasta Dam, and/or involve the

		proposed Sites dam targeting Colusa County. If you believe such water sources are a component of the DCP as the documentation appears to indicate, then please say so in regards to each alternative offered – and then proceed with thorough analysis of species and impacts to indigenous people and culture, etc. for those watersheds proposed to be further raided for water.
543	Greg Knoblich	I am opposed to the proposed Central Corridor.
544	Betty Miller	I am opposed to the proposed Central Corridor.
548	Bill Wilson	If Southern California needs additional water it should come from Ocean Water desalination
554	Dennis Park	There are much cheaper, less disruptive solutions to Southern California water needs. Proposals from covering the existing waterways to other reasonable proposals actually increase the acre-feet reaching or southern neighbors and at costs well than 10% of this proposal.
555	Jeffrey P. Sutton Tehama Colusa Canal Authority	TCCA strongly feels that a robust and detailed proposed operational plan is an absolute requirement in the development of this Project, thereby allowing concerned stakeholders to analyze and assess the potential impacts, benefits, and details associated with this Project and how it will operate.
557	Tim McCabe	We should put a desalination plant in L.A. using the offshore platforms that will never be used to pump oil. These are useless platforms that are not being used.
560	Bradford Pappalardo Steamboat Resort	But, the answer is not a conveyance system that doesn't produce an extra drop of water as proposed. Don't you think there should be some way of storing the water in the plan? Why is it a Delta Conveyance? Why isn't it a California Water Plan? How myopic. The Sacramento River is a long river. There must be a location from which you can build tunnels and intakes with less impact and where it is easier to deliver construction materials to. Where is the debate on alternatives? In 80 years since the inception of the State Water Project, things have changed.
560	Bradford Pappalardo Steamboat Resort	so support the idea of intakes at Sherman Island and Congressman Garamendi's plan of intakes near the Sacramento Deep Water Ship Channel. We should seriously consider other options than to utterly destroy prime farmland, a unique agriculture community comprised of family owned farms and the irreplaceable Delta Legacy communities. Instead, at least $250 million dollars has already been spent on an incredibly contentious project that will ruin the lives of those in the Delta and only provide a small benefit to the project proponents. $250 million could have been put to a more beneficial use of maintaining and improving the current conveyance system.
561	Diane Riddle State Water Resources Control Board	The EIR should include a reasonable range of conveyance and operational alternatives. Sizing and alignments for the conveyance facility should be considered that avoid, minimize, and/or mitigate construction and siting related impacts and impacts to other legal users of water. Operating scenarios should be considered that improve conditions for native fish species that are currently in poor condition by improving Delta outflows, reducing entrainment and impingement related effects of SWP (and possibly CVP) diversions, improving cold water management, and other measures without redirected impacts to native fish species. Specifically, the EIR should evaluate a scenario that is consistent with the State Water Board's efforts to update the Bay-Delta Plan to improve protections for native fish species. In 2018,the

		State Water Board updated the Lower San Joaquin River Flow objectives in the Bay-Delta Plan and released a Framework for potential updates to Sacramento River and Delta inflow and outflow, interior Delta flow, and cold water habitat objectives included in the plan based on science summarized in the State Water Board's Scientific Basis Report. In addition, efforts are currently underway to develop proposed voluntary agreements that could be in effect for 15 years or longer if approved as a method to update/implement the Bay-Delta Plan. State Water Board staff is available to assist with the development of scenarios that serve this purpose.
562	Barry Sgarrella SolAgra Corporation	The SolAgra Water Solution is a viable alternative to the Delta Conveyance Project. SWS evaluation under NEPA and CEQA, as well as the Clean Water Act is required. An additional basis for consideration of the SolAgra Water Solution is for purposes of determining the Least Environmentally Damaging Practicable Alternative ("LEDPA"). (See 33 U.S.C. § 1344(b)(1).) USACE regulations provide, "[N]o discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem." (40 C.F.R. § 230.10(a).) USACE regulations specifically require the applicant to identify possible practicable alternatives especially including those alternatives that do not involve the discharge of fill material. (40 C.F.R. § 230.10(a)(i).) The SWS does NOT involve discharge of fill materials.
562	Barry Sgarrella SolAgra Corporation	The SolAgra Water Solution project would include rebuilding and raising the height of the Sherman Island levees to harden and protect the new infrastructure from the effects of sea level rise. The desalination plant would be constructed on approximately 100 acres of elevated pad (built from tunnel material mined as part of this project) that would additionally protect the plant from future sea level rise. The solar power plant that will provide renewable energy to operate the desalination and pumping plants will be built with elevated solar arrays using SolAgra Farming® - a patented technology protected by U.S. Patent Number 10,615,738 and other patents pending.
562	Barry Sgarrella SolAgra Corporation	The SolAgra Water Solution is a practicable alternative that would have a less adverse effect on the aquatic ecosystem than the currently proposed DCP. In particular, the SWS requires only one 19-mile long mile tunnel instead of a 38.5- mile long tunnel, PLUS the SolAgra tunnel would have a 28-foot diameter, appreciably smaller than the 40-foot diameter tunnel proposed in the DCP. Moreover, since the SolAgra tunnel would run primarily south of the Delta from Sherman Island to the SWP facilities at Bethany Reservoir, NO WATERS OF THE UNITED STATES/ WETLAND fill would be necessary. DCP proposes more than 15 million cubic yards of tunnel excavation/ fill material to be deposited in pristine areas of the Delta, the SolAgra Water Solution would deposit less than 1.5 million cubic yards of fill material, and this material would all be deposited on Sherman Island to improve levees and to build an elevated pad for the desalination plant. Any additional material would be deposited in areas that are currently upland grazing areas (not wetlands). This fill material would be beneficial to the environment by increasing levee height and stability and by offsetting the land subsidence that has occurred on Sherman Island over many years. When graded and compacted, the fill area that is not beneath the desalination plant can be seeded and returned to grazing with no impact to the environment. The SWS produces less than 10% the amount of fill material (tunnel boring spoils) as the DCP. The SWS tunnel path uses existing easements and rights of way

		beneath existing state highways (SR-160 & SR-4) so that no private lands must be purchased or "taken" by eminent domain. Due to the location of the SolAgra tunnel, approximately 50% of the material removed from the tunnel will be rock that is sourced from beneath the foothills of Mt. Diablo. This rock will be used to rebuild Sherman Island levees and to build the fish-screening permeable levee sections that allow fresh and brackish water to be brought onto Sherman for processing and desalination.
562	Barry Sgarrella SolAgra Corporation	The total tunnel length proposed in the DCP is more than 38.5 miles. This is twice the length of the SolAgra tunnel.
562	Barry Sgarrella SolAgra Corporation	The SolAgra plan would be constructed near existing high capacity powerlines and ultimately be powered in large part by a SolAgra Solar Power plant that can be built on existing grazing land on Sherman Island.
562	Barry Sgarrella SolAgra Corporation	Water from SolAgra's proposed Sherman Island water processing and desalination plant is NOT vulnerable to drought or projected sea level rise. It will provide greater reliability to ensure more water and higher quality water than proposed by the DCP.
562	Barry Sgarrella SolAgra Corporation	The SolAgra Water Solution can be built in less time and at less cost both financially and environmentally.
562	Barry Sgarrella SolAgra Corporation	The water quality in the Sacramento River at Sherman Island is similar to the water that could be drawn at Clarksburg by the DCP. The desalinated water produced by the Sherman Island Desalination Facility will be 99% pure and far superior to Sacramento River water. Therefore, the blended output from the Sherman Island Desalination Facility will exceed the water quality that can be sourced by the DCP from diversion of the Sacramento River at Clarksburg.
562	Barry Sgarrella SolAgra Corporation	The SolAgra Water Solution will better restore Sacramento River flow pathways and volumes, resulting in significant benefits to native fish species and other wildlife in the Delta. It will also benefit fishermen, local residents and farmers. SolAgra Water Solution would source the SWP's entitlement through intakes on Sherman Island using land that is already owned by the State of California.
562	Barry Sgarrella SolAgra Corporation	SolAgra Water Solution would increase the SWP's capabilities to export water to the rest of California. In fact, the SolAgra Water Solution is the only alternative with the capability of generating up to 1 million acre-feet of "new" drinking water each year by filtering and desalinating brackish water arriving on the tides from Suisun Bay. The SolAgra Water Solution provides this capability irrespective of drought conditions and sea level rise.
562	Barry Sgarrella SolAgra Corporation	SolAgra Water Solution would employ a Public-Private partnership similar to the business structure that was used by our Joint Venture Partners, IDE Technologies to design and build the largest seawater desalination facility in the Western Hemisphere in Carlsbad, California – just north of San Diego. Desalinating brackish water from the southern tip of Sherman Island, with only 2-4% the salinity of seawater, can be up to 25 times more efficient and far less power intensive than desalinating 100% seawater as is being successfully done in Carlsbad, CA today.
562	Barry Sgarrella SolAgra Corporation	The SWS would produce the same volume of water (2.4 Million AF/year) at Sherman Island than is currently pumped from the south Delta at the Banks Pumping Plant ("Banks") during a "normal-water

		year". However, our use of desalination produces higher quality water than is pumped at Banks. This very high-quality water provides significant benefits to the State Water Contractors that purchase water from the State Water Project. T he water production and pumping to the SWP is accomplished using renewable energy. Banks currently uses 11 – 26,000 horsepower pumps to pump water from the Clifton Court Forebay up to Bethany Reservoir, where it enters the SWP. This is a vertical rise of 244 feet. The SWS would pump directly from Sherman Island to Bethany Reservoir using pressure created by the desalination plant to pump water to Bethany Reservoir, thereby bypassing Banks. This allows the current renewable WAPA power used at Banks to become available for other uses while Banks is on standby, and it makes Banks available for a better use. In high-water years when water is plentiful and significant hydroelectric power is available to power Banks, that pumping plant would be used, as needed, to create surge pumping capacity that has never before existed. This accomplishes the "Big Gulp" aspired to in the BDCP/CWF and DCP, and it does so with renewable energy. The SWS would provide this increased surge capacity. This capacity combined with the prudent design and construction of additional high capacity "plumbing" could move large quantities of water during the infrequent flood stages when reservoirs throughout the state are releasing water to avoid overtopping. This "Big Gulp" flow can be used to recharge aquifers and the excess stored in Tulare Lake for later redistribution to the San Joaquin Valley water districts. The needs of the Central Valley Project ("CVP") can be addressed by this side of the equation. This provides a complete, environmentally superior alternative to the DCP. The SWS would be powered by renewable energy from SolAgra's proposed Sherman Island Solar Power Plant. When required, that solar power could be augmented by wind power from the existing nearby Rio Vista wind farms. All power would be delivered via existing power corridors. No additional easements or rights of way would be required.
562	Barry Sgarrella SolAgra Corporation	The SWS would create a dual-plant, interconnected water processing system on State-owned land at Sherman Island. Plant #1 filters and processes incoming fresh water from the Sacramento and San Joaquin rivers via multiple fish-screened intakes around Sherman Island. Plant #2 intakes brackish water through fish-screened intakes on Sherman Lake and Mayberry Slough and desalinates this brackish water very efficiently due to the low salinity (when compared to sea water). After processing, desalinated water from Plant 2 is blended with fresh, filtered water from Plant 1. The combining of fresh water with the treated and desalinated brackish water will replace the 2.4 million Acre-Feet/year of lower quality fresh water that is currently conveyed through the SWP in a "normal water year." The water produced at Sherman Island will be of higher quality than the water that is pumped from the Clifton Court Forebay in the south Delta via Banks because it will be processed at Sherman Island, not just screened and pumped. This means the State Water Contractors that receive the water from the SWP will receive higher quality water than they currently receive from Banks, OR they would receive from the DCP tunnel. The SWS is the ONLY alternative that processes and desalinates the water before supplying it to the SWP. The SWS can augment the low flow of fresh river water in years of reduced river flow due to drought or other issues. The output volume of the desalination plant can be increased to provide additional desalinated water to make up for reduced quantities of available fresh water caused by drought or sea level rise. The separation of processing functions into two discrete, but interconnected plants, allows both plants to operate at peak efficiency, while still accomplishing the end result of producing 2.4 Million Acre-Feet/year of fresh water for the SWP

		irrespective of drought conditions. The new fresh water that is produced at Sherman Island will be pumped through a single, 28-foot ID pressure tunnel that is only 19 miles long(see Exhibit 2). This is far superior to the 40-foot tunnel that is 38.5 miles long proposed by the DCP. Since the incoming water to Sherman Island will be fish-screened by long, low-velocity intakes via permeable levees as it enters the island, and it will be pressurized via the filtration and desalination processes, it can completely bypass the Clifton Court Forebay and the Banks Pumping Plant. It can be pumped directly to Bethany Reservoir, where it will begin its gravity flow into the SWP's California Aqueduct.
562	Barry Sgarrella SolAgra Corporation	The principle objectives and benefits of intake relocation to Sherman Island as proposed in the SWS: By placing the Banks Pumping Plant on standby, the 2.4 Million Acre-feet/year ("MAF") being drawn into the Banks' intakes would instead be permitted to once again flow completely through the Delta. This would restore natural flows as they occurred before the State Water Project began operations in 1960. After flowing completely through the Delta, 1.4 MAF is brought onto Sherman Island and added to 1.0 MAF of new desalinated water that is sourced from brackish water in Sherman Lake on the south end of Sherman Island. The additional 1.0 MAF of river-flow fresh water that is not brought onto Sherman Island continues its flow into the San Francisco Bay/Delta Estuary ("SFBDE"). This additional flow supports the retention of X2 at its historic range OR moves it further west. This improves water quality in the SFBDE and facilitates the recovery of natural breeding and feeding grounds for aquatic species of concern. This meets the recommendations for increased minimum Delta outflow that the EPA; State of the Estuary Report; State Water Resources Control Board and many other analyses have clearly shown are necessary to restore the Bay-Delta and its fisheries. Improves both in-Delta and export water quality, rather than improving export water quality at the expense of in-Delta water quality. The SWS tunnel passes near Los Vaqueros reservoir which would allow a portion of the new high-purity water to be stored in Los Vaqueros or distributed to water agencies in Contra Costa County, the Cities of Antioch, Pittsburg and to directly serve Zone 7 (Silicon Valley water agencies). This would provide badly needed new water supply to supplement the Contra Costa Canal that has limited water intake possibilities at Mallard Slough and Rock Slough with the increase in salinity along the Antioch/Pittsburg waterfront. These intakes are limited to a few months per year and without desalination they will become completely unusable with additional sea level rise that is occurring now. The high elevation of Las Vaqueros would also provide the opportunity for pumped hydro energy storage and power production that could additionally serve the Sherman Island desalination plant at night. Avoids significant impacts to the Sacramento Region, including North Delta communities, farmers, water supplies and flood control facilities.
562	Barry Sgarrella SolAgra Corporation	The power easements and water conveyance rights-of-way currently exist. No additional purchases of easements or rights-of-way are required. The State of California Department of Water Resources owns 8,776 acres on Sherman Island. This is much more land than needed for the facilities that are proposed by the SolAgra Water Solution. No additional land must be condemned or acquired. No Delta property owners must be displaced or have their lives and/or farming operations temporarily or permanently ruined.
562	Barry Sgarrella SolAgra Corporation	The SolAgra Water Solution would preserve natural river flows and maintain water quality in the Delta while simultaneously improving reliability of the water supply. It would also minimize or completely avoid

		many of the significant environmental impacts that will be identified in the DCP EIR/S. The SWS is the drought-proof solution that has been desperately needed in California for more than 50 years. This Plan IS the necessary alternative to the "serial engineering" that has been plaguing California since the creation of the CVP and the SWP. The SWS is a practicable and superior alternative to the DCP. It must be fully evaluated.
562	Barry Sgarrella SolAgra Corporation	NO NEW WATER! Even if the State elects to move forward with the DCP, the SolAgra Water Solution is the only solution that can produce up to One Million Acre-Feet of new water every year irrespective of scientifically predicted drought, climate change or other natural disasters and efficiently deliver that water to the State Water Project for distribution throughout the State.
563	Federico Barajas San Luis & Delta Mendota Water Authority	The EIR must include the operations reflected in the February 19, 2020, Record of Decision issued by Reclamation for the long-term operation of the Central Valley Project and State Water Project. Additionally, because the Water Authority's member agencies receive supplies from the CVP, we request that DWR evaluate the full range of conveyance alternatives that meet the Proposed Project objectives, including cost-effective tunnel sizes and operations up to a 7,500 cfs capacity, single-tunnel alternative, canal options, and full involvement of the CVP.
564	Elsa Rose	The WaterFix plan was better with the tunnel route going south of Beacon Island with the shaft on Victoria Island.
567	David Abelson	It is imperative that DWR include in its Draft EIR an assessment of potentially feasible "west-side" or "western route" locations and corridors, specifically the "Fremont Weir/Yolo Bypass Alternative," described herein.
567	David Abelson	By removing and isolating the water transport system from the delta itself, the east-side project seeks to obtain a more reliable quantity of water for export. To achieve this goal, the proposed relocation may reduce some of the on-going damage to endangered fish specifies now caused by the existing pumps that are withdrawing large amounts of water directly from the south delta. In addition, by removing the water transfer system from the delta itself, the DCP seeks to reduce the risks to water quality now posed by a combination of weak levees, rising sea levels and a large regional earthquake. Constructing an isolated conveyance tunnel deep underground may be one way to address such water quality concerns, but it is certainly not the only way.
567	David Abelson	Question: What should DWR do if it receives thoughtful scoping comments that identify one or more "potentially feasible" west-side alternatives to the proposed tunnel project, particularly if such alternatives could (1) achieve the twin goals of better water quality and more reliable water quantity; (2) provide far greater environmental benefits; and (3) cause far fewer adverse environmental and social impacts? Answer: To comply with CEQA's scoping and alternatives requirements, DWR should place such potentially feasible west-side alternatives into its draft EIR, thereby providing a meaningful opportunity for the thorough and thoughtful review needed to "foster informed decision making and public participation."
567	David Abelson	Before describing the west-side Fremont Weir/Yolo Bypass (FW/YB) alternative, it is important to emphasize that this proposal is not intended to answer the imponderably complex question of "how much

		fresh water can or should be diverted from one watershed to another?" Rather, this west-side alternative accepts the fact that some amount of water has been and will continue to be transferred from the Sacramento River watershed to regions south of delta. Thus, the relevant question becomes "how can such water transfers be accomplished in the most natural and least destructive way possible?"
567	David Abelson	Planners and engineers for six decades have proposed various types of physical structures designed to move fresh water from the Sacramento River in the north, through and/or around the Delta, and on to various destinations south. These proposals have a common characteristic – they rely primarily on brick and mortar structures designed and engineered to mechanistically isolate, divert, and then transfer Sacramento River water from its natural channels to other locations outside of the watershed.
567	David Abelson	West-side Fremont Weir/Yolo Bypass alternative: Allow a natural river system to accomplish most of the work needed to provide 1) a reliable quantity and quality of fresh water for export; 2) a return to the lower Sacramento Valley watershed to its more natural state; 3) substantial mitigation for any significant adverse impacts that remain.
567	David Abelson	To achieve the water quality and quantity goals listed above, the west-side alternative would allow fresh water to flow naturally into and downstream through the Yolo Bypass, commencing at the Fremont Weir (near Knight's Landing) and exiting through an appropriately sized "toe drain" or "glory hole" (located near Rio Vista.) From there, the authorized amount of fresh water would be transferred southeast to the export facilities located near Tracy, via a relatively short tunnel and/or other conveyance structure.
567	David Abelson	Key Features of the West-Side Fremont Weir/Yolo Bypass Alternative: (a) Multiple Points of Entry Water intended for export would flow into the Yolo Bypass from multiple points of entry, beginning at the Fremont Weir and/or the Sacramento Bypass Wildlife Area, and perhaps including other downstream points of entry such as the Deep Water Ship Channel near West Sacramento.
567	David Abelson	(i) Greater Operational Flexibility - First, multiple points of entry located far apart from each other, allow for much greater operational flexibility regarding when, where and how water enters the Bypass at any given location. Such operational flexibility will provide important environmental benefits, such as providing more options for ongoing salmonid restoration efforts.
567	David Abelson	(ii) Better Water Quality Assurances - Enhanced water quality assurances are yet another major benefit of these upstream entry points. Two of the three locations are situated well above the urban and industrial development in Sacramento. Thus, there is little or no chance of these water supplies becoming directly contaminated by toxic waste, untreated sewage, or other dangerous discharges cause by a catastrophic urban event downstream(e.g. an industrial plant explosion, an inoperable sewage system, etc.)In addition, any adverse water quality impacts caused by poisonous discharges entering the Sacramento River below the upper two weirs, but above the third point of entry to the Bypass (e.g. the Deep Water Ship Channel), could be mitigated by simply closing-off the third entry point, thereby preventing the contaminated water from damaging the water quality of the other two fresh water sources. Finally, even water contamination occurring below the third point of entry would not degrade the other two sources of clean water, because

		these other sources would no longer be forced to commingle with the degraded water at a single point of export, such as the DCP's proposed tunnel near Hood.
567	David Abelson	(iii) Safer Spawning Locations for Delta Smelt - Third, all of these proposed points of entry are located far enough upstream to eliminate any possible danger to smelt attempting to spawn in the north delta, where the DCP now proposes to install three large water diversion intakes.
567	David Abelson	Key Features of the West-Side Fremont Weir/Yolo Bypass Alternative: (b) A Natural Riverine Transport Corridor Upon entering the Yolo Bypass, water will be transported south via a natural, surface-level riverine corridor, propelled by gravity. As proposed, the water passing downstream along this surface corridor would not be hidden in a deeply buried underground tunnel, nor would it be confined to a man-made concrete canal or engineered "straight jacket" of narrow levees. Rather, it would be allowed to carve out a natural meandering streambed all the way down to the point of export near Rio Vista.
567	David Abelson	(i) Elimination of Virtually All Significant Adverse Impacts On The East-Side: The DCP proposes to build an enormous 40 mile tunnel along the east-side of the Sacramento River. The significant adverse environmental, social and economic impacts of this project on the small delta communities and rich farmlands located near this east-side corridor are incalculable. Moreover it is virtually certain that many of these adverse impacts cannot be mitigated to the level of insignificance, as required by CEQA. However, virtually all of these significant adverse impacts will be eliminated if the location of the water transport system is removed entirely from the east-side corridor and relocated to the west-side Yolo Bypass corridor instead.
567	David Abelson	(ii) The Potential for Significant Environmental Enhancements and Restoration: Since the gold rush in 1849, California has lost more than 90% of its natural wetlands and native riparian habitat. The proposed alternative of a west-side surface river transport system through the Yolo Bypass will cause little, if any, additional harm to the natural environment. To the contrary, this natural riverine system will significantly aid in restoring much of the riparian habitat that existed in the floodplain before the Sacramento River was narrowly channelized in the late 19th century (to scour out hydraulic mine tailings.)
567	David Abelson	(iii) A Substantial Reduction in Total Project Costs and Construction Delays By relocating the DCP from the east-side corridor to the west-side corridor, and by relying more on a gravity-driven surface transport system rather than a concrete tunnel from beginning to end, the total capital and operational costs of this project should drop substantially. Why are these costs likely to drop? Here are four obvious reasons: (1) the capital costs of three large diversion intakes and related fish screens would be eliminated; (2) the capital costs of a much longer concrete tunnel will be reduced; (3) the operation and maintenance costs for a far smaller and simpler project will be lessened; (4) the extensive delays resulting from massive east-side community opposition and protracted litigation will be reduced; and (5) the probability of ultimately prevailing in the courts will be enhanced.
567	David Abelson	Key Features of the West-Side Fremont Weir/Yolo Bypass Alternative: (c) Extraction Options At The Southern End of The Bypass Water flowing down the Yolo Bypass is currently drained through a southern riparian channel known quite simply as the "Toe Drain." This is one way to extract water from the Bypass

		for transfer to the export facilities near Tracy. Another stationary export option might be a so-called "glory hole," such as the one in operation at Lake Berryessa. Located near the Monticello dam, this spillway consists of a single, vertical, bell-shaped extraction portal that drops water 200 feet straight down, for release into Putah Creek at the base of the dam. The pipe has an intake diameter of 72 feet, which shrinks down to about 28 feet at its base. This spillway has a maximum capacity of 48,000 cfs, and operates whenever there is excess water in the reservoir.
567	David Abelson	(i)Environmental Benefits: Removing fresh water supplies from the Bypass via this kind of gravity-driven downward draining device would eliminate the need for massive lateral drain intakes, which can cause extensive damage to aquatic eco-systems through entrainment and impingement of food-chain organisms and native fish.
567	David Abelson	(ii)Economic Benefits: The capital costs of three large lateral intakes would be eliminated, along with the operational and maintenance costs of such intakes. In addition, electricity could actually be generated at the export site, helping to offset any costs associated with pumping the water to its final destination, described below.
567	David Abelson	(d) A Transport System To Convey The Water to Export Facilities Near Tracy The last leg of the journey is a transport system that can move water to the export facilities near Tracy. This transport process can be accomplished in several different ways, including pressurized pipes and/or a relatively short tunnel structure underneath the delta.
568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	An alternative which requires that the S.P. and CVP be operated in accordance with current law is a reasonable alternative which must be rigorously and objectively evaluated. The Proposed Project clearly ignores the law establishing the priorities for meeting needs within the Delta and other areas of origin including the needs of fish and wildlife. The ability of the S.P. and CVP to deliver "full contract amounts" never existed and thus could not be restored or protected. The words "up to" conceivably should cover a range from zero deliveries to a high of what can be supported with full compliance with State and federal law and hydrologic conditions. The projects have not been able to meet even the D 1641 requirements. Although obviously not intended by DWR in controlling the preparation of the DEIR, arrange of reasonable alternatives must be considered including substantially reduced and at times no exports from the Delta. The upper range is of course limited by law and hydrology. An impartial evaluation is needed to determine the true capability of the export projects to provide surplus water for export while meeting D-1641 over a drought comparable to the 1928/29 through 1933/34 drought, while at the same time meeting listed species requirements, senior water rights, salinity control and providing an adequate supply to serve the needs in the Delta and other areas of origin.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	in January 2013 a coalition including NRDC and Defenders of Wildlife proposed a single Delta tunnel as part of a portfolio alternative for the Delta and asked the State to evaluate the alternative.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	NRDC remains open to the concept of new conveyance in the Delta, provided that new conveyance in the Delta is part of an enforceable portfolio that: (1) significantly improves conditions for native fish and wildlife, in part by substantially reducing water diversions from the Bay-Dela;
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	NRDC remains open to the concept of new conveyance in the Delta, provided that new conveyance in the Delta is part of an enforceable portfolio that: (2) minimizes and avoids impacts to communities in the Delta from the construction and operation of such a facility;
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	NRDC remains open to the concept of new conveyance in the Delta, provided that new conveyance in the Delta is part of an enforceable portfolio that: (3) includes significant investments in sustainable local and regional water supply projects to help offset reduced water diversions from the Delta.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Finally, the NOP indicates that the scoping process will inform operations to be analyzed in the DEIR. We strongly suggest that the DEIR include a range of operational alternatives that strengthen protections for fish and wildlife, including: (1) one or more alternatives that are consistent with the operations outlined in the SWRCB's July 2018 Framework for the Sacramento/Delta Update to the Bay-Delta Plan; (2) one or more alternatives that are consistent with the operational criteria identified by NRDC et al in our opening statement to the SWRCB for Phase 2 of the water rights proceeding for the California WaterFix project. These operational requirements include significant increases in Delta outflow to protect longfin smelt, Delta Smelt, and other native fish species, and prohibitions on diversions from new conveyance when flows at Freeport are less than 35,000 cfs to protect salmon (see Perry et al 2018). In order to comply with state and federal laws, the proposed project must strengthen environmental protections as compared to the environmental baseline.
571	Karen Jacques	The EIR should include alternatives to the tunnel that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. This should specifically include a "no tunnel alternative" and an in depth analysis of how a combination of water conservation, efficiency and recycle/reuse and other demand reduction measures would be less environmentally damaging than the tunnel and achieve the same (or better) water reliability supply goals. This analysis should look at resiliency: i.e., given the uncertainty of how rapidly the climate will reach major tipping points and the potential for climate related natural disasters, would a series of local solutions provide more water security then dependence on one large, costly solution.
571	Karen Jacques	The EIR must also analyze all economic costs and benefits of the tunnel and those of a no-tunnel alternative that includes investment in water conservation, efficiency and water infrastructure improvements to meet current and future water supply needs. It is necessary that this analysis include comparison for a tunnel and no-tunnel alternative for Southern California rate payers.
576	Kelley Taber	CEQA requires that DWR consider alternatives to the Project capable of avoiding or substantially lessening its significant impacts. For the reasons discussed above, the proposed intake locations threaten significant

	Sacramento County Water Agency	impacts to the FRWP, the Hood wells, and surface and groundwater supplies. DWR staff have represented in Project scoping meetings that there are no available alternative intake locations due to fish concerns. This is inaccurate and contradicted by information developed in the WaterFix CEQA process. Moreover, such statements suggest that DWR has improperly prejudged the scope of its alternatives analysis, such that the Draft EIR may be no more than a post-hoc rationalization for the Project. Information in the WaterFix EIR Appendix 3F, Intake Location Analyses (pp. 3.F.6-3.F.8), relying on the Fish Facilities Technical Team report, indicates that there are suitable intake locations farther downstream below Steamboat Slough (identified as intakes 6 and 7). Moving intakes farther south on the Sacramento River would reduce the potential for conflicts with, and significant impacts to, SRWTP operations, and thus the FRWP operations, as well as the Hood wells, and have the benefit of being better for salmon. Moving the intakes to avoid impacts to the FRWP and SRWTP also would avoid significant impacts to tribal cultural resources identified by Miwok Tribal government representatives at the February 26, 2020 Delta Stakeholder Engagement Committee meeting, where DWR staff was informed that all three intakes are highly sensitive to the Miwok and include several village sites and more than 5 burial grounds. At a minimum, the draft EIR alternatives must include a robust analysis of alternative locations for the intakes that avoid these significant impacts. Given the potential for significant impacts to the quality and reliability of water supply for Delta water users, and Delta Reform Act mandates, the EIR also should fully evaluate both a non-structural alternative that should include water reclamation, localized desalination, and increased capture and storage of localized rainfall in lieu of continued or increased Delta exports, as well as alternative intake locations that avoid impacts to Hood and the FRWP. Finally, in order to protect water supply reliability for water users in and north of the Delta, consistent with the Delta Reform Act, the EIR should evaluate operating scenarios that include limitations on the amount and timing of diversions capable of avoiding any significant impacts to Delta water quality and in-Delta or upstream water supplies.
602	Patrick Porgans Porgans & Associates	If I had reason to believe that there was no other feasible alternative but to construct a tunnel, I would consider supporting it. However, as provided for in my testimony and exhibits, prefaced entirely on government documents, before the California State Water Resources Control Board (SWRCB), during the so-called California Water Fix Hearing, the data submitted indicates that with several modifications to the operation of the SWP, and conversion of some Delta islands, on the western fringe of the Delta, it can increase the annual water supply (firm-yield) of SWP, from the delta, in most water-year types, by 300,000 to 500,000 acre-feet of water without the tunnel!
610	Henry Kuechler Reclamation District No. 2060	The proposed project is projected to cost $12 billion, to meet this and other objectives. This objective could also be met by improvements to the existing levee system for a much lower investment. Investments must be made in the levee system regardless.
610	Henry Kuechler Reclamation District No. 2060	The EIR must include a comprehensive discussion of the alternative locations of the water conveyance facilities that will reduce or avoid the substantial impacts expected to occur within the north Delta if the facilities are located there. Evaluate alternative size and configurations, and impacts associated with each option.

610	Henry Kuechler Reclamation District No. 2060	The following are other feasible alternatives that meet the listed project objectives and must be included in the EIR: Improve levees to a seismic standard Consider an intake at Sherman Island Consider Congressman Garamendi's "Little Sip/Big Gulp" that utilizes the Deep Water Ship Channel.
612	Warren Bogle Reclamation District 150	The proposed project is projected to cost $12 billion, to meet this and other objectives. This objective could also be met by improvements to the existing levee system for a much lower investment. Investments must be made in the levee system regardless.
612	Warren Bogle Reclamation District 150	The EIR must include a comprehensive discussion of the alternative locations of the water conveyance facilities that will reduce or avoid the substantial impacts expected to occur within the north Delta if the facilities are located there. Evaluate alternative size and configurations, and impacts associated with each option.
612	Warren Bogle Reclamation District 150	The following are other feasible alternatives that meet the listed project objectives and must be included in the EIR: Improve levees to a seismic standard Consider an intake at Sherman Island Consider Congressman Garamendi's "Little Sip/Big Gulp" that utilizes the Deep Water Ship Channel.
615	Justin Fredrickson California Farm Bureau	Further, it should be stressed that short-term, near-term and long-term Delta conveyance solutions—including potential phasing of related components over time—do not replace the clear need for major on-going investments in water infrastructure statewide, including above- and below-ground storage and local and regional conjunctive use and groundwater recharge projects. Rather, all of the pieces should build, in an orderly fashion, towards an integrated whole.
615	Justin Fredrickson California Farm Bureau	A reasonable range of alternatives in the EIR should consider a potential West Alignment option, including an alignment that could potentially reduce costs, impacts, and time to implementation by using the existing Sacramento Ship Channel as a conveyance. Potential smelt or other fisheries impacts and navigation impacts of such an alignment would need to be addressed. Fisheries impacts could be potentially addressed by means of an engineered solution and, in part, by means of potential fish habitat enhancements including, for example, the Department's long proposed Prospect Island restoration site. Any the same time, potential impacts associated with Prospect Island restoration, or with any similar project in the area would, themselves, need to be addressed—for example, potential under seepage and levee impacts to adjacent tracts and islands and impacts on local diversions.
615	Justin Fredrickson California Farm Bureau	While the proposed Central Alignment looks very similar, if not identical to the current proposal's immediate predecessor (the 9,000-cfs proposed California Water Fix two tunnel option), the new Eastern Alignment (closer to I-5) appears to follow something closer to the route of the old Peripheral Canal. Obviously, the reasons for inclusion of the new Eastern Alignment, along with the reasons for any continued exclusion of a potential Western Alignment—will require full analysis in the Department's EIR, as will the alignment's relative costs, community impacts, etc. At a glance, the proposed Eastern Alignment Corridor features more potential terrestrial points of access, but appears to be a longer route, traverses more high-value farmland and much more private land (as opposed to state-owned and/or Metropolitan Water District-owned lands), likely has more community impacts, etc. The Central Alignment, however, has many impacts and associated issues as well, in addition to having fewer ready terrestrial points of access

		but also, perhaps, the possibility of alternative water-side access by barge. Regardless, major potentially unavoidable impacts associated with both the proposed Eastern and Central alignments, again, highlight the need for inclusion of a potential Western Alignment alternative—particularly, as noted, if a Western Alignment could be configured to reduce costs, reduce impacts, and/or reduce or avoid undue community disruption.
615	Justin Fredrickson California Farm Bureau	Among other potential measures, some potential linked options to address perennial issues in the South Delta include dredging and permanent operable gates under the proposed the South Delta Improvement Project.
615	Justin Fredrickson California Farm Bureau	Project alternatives and associated operational criteria should pay close attention to implementation time, water supply, long-term reliability from an agricultural and CVP standpoint, as well as affordability and economic feasibility and ability to pay. Among other relevant factors, this would include appropriate consideration of the need for significant parallel investment under SGMA at the local and regional level.
616	Larry Gardiner Brannan-Andrus Levee Maintenance District	The proposed project is projected to cost $12 billion, to meet this and other objectives. This objective could also be met by improvements to the existing levee system for a much lower investment. Investments must be made in the levee system regardless.
616	Larry Gardiner Brannan-Andrus Levee Maintenance District	The following are other feasible alternatives that meet the listed project objectives and must be included in the EIR: Improve levees to a seismic standard Consider an intake at Sherman Island Consider Congressman Garamendi's "Little Sip/Big Gulp" that utilizes the Deep Water Ship Channel.
617	Bob Panzer	Devise an investment program that continues through-Delta conveyance, subject to the rules of water quality plans and biological opinions, but which seeks to boost local and regional self-sufficiency as an alternative that seeks to address seismic and climate risks for SWP customer service areas.
619	Bob Panzer	Balance decisions with consideration for maintaining, retrofitting, repairing and preserving existing water agencies' infrastructure, especially future repairs and changes needed at Oroville Dam.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, alternative locations for the proposed intakes, and all other proposed components of the Project, would lessen impacts on the Residents, each of the Residents, and the Clarksburg Community, or any significant part of the Clarksburg Community, than, and in comparison to, the currently proposed northernmost proposed intake.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Show how sites, other than each of the three proposed intakes, considered by the Fish Facilities Technical Team were determined to be less impactful on the Clarksburg Residents, each of the Residents, and the Clarksburg Community, or any significant part of the Clarksburg Community.
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	We suggest DWR analyze a no-project alternative and consider other innovative ways for implementation in the southern part of the state that will build their overall water resiliency.

626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Analyze a no pumping/no project alternative in the Draft EIR.
627	Nichelle Garcia	The EIR should analyze alternatives that would increase Delta outflow and reduce water exports as compared to current conditions in the Delta.
627	Nichelle Garcia	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful and more economical than the tunnel and achieve the same water supply reliability goals and targets.
627	Nichelle Garcia	DWR must investigate serious alternatives, including a no tunnel alternative that could address the main objectives of this project without any additional water diversions. Input from tribes, traditional ecological knowledge, and the recommendations in the Environmental Water Caucus' "A Sustainable Water Plan for California," should be considered in developing a No Tunnel alternative.
628	Jacklyn Shaw	Consider the Delta west side alternative.
628	Jacklyn Shaw	Consider desalination.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	We request that other priorities might be attended to instead of moving forward with the Delta Conveyance Project draft environmental impact report (DEIR). Examples of other priorities include determining minimum flows for our streams and rivers that contribute to the Delta so that flood flows can be better estimated or creating a database that tracks water transfers for surface or groundwater supplies and how these existing water transfers and SGMA efforts might negate the need for the Delta Conveyance Project.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	The eastern corridor, if selected, will represent a greater impact to our local environment. These impacts are far reaching and in addition to air quality impacts, rail and water transport options will be affected including the already bottlenecked rail area in the southern part of Stockton. Moving the tunnel east as a means to reduce construction costs will force those direct and indirect environmental and transportation related costs on the residents of San Joaquin County. How will the Delta Conveyance Project funders reimburse the residents of Stockton for higher transportation costs, road and rail improvements, and loss time; as well as those harmed due to increased concentrations of air pollutants?
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	The DEIR should fully analyze alternatives that are less environmental harmful, including the no-project alternative. These alternative analyses should be comprehensive and include existing efforts to manage water in the State of California.
632	Robert Hunter Municipal Water District of Orange County	Unfortunately, we find that the proposed range of alternatives within this scope does not even overlap this preferred alternative from the previous California WaterFix effort. Sizing the project sufficiently is absolutely necessary to reliably capture storm water flows in the windows of opportunity during the decades ahead. Per the requirements of CEQA, the EIR must "develop a reasonable range of alternatives to evaluate in the EIR." Thus the list of alternatives should be expanded to include larger projects, like

		alternative(4A) from California WaterFix, in the scope of the EIR due to fact that the reasonable range is required under CEQA.
634	Chuck and Mary Niessen	Please reconsider you plans for the Delta and the tunnel. The Delta is a precious commodity for the California Bay Area, not only for the ecology but for the local communities that depend on the water supply, the boating community that uses the rivers and canals. We have been fighting this project for too long and wish for the folks in Southern California find another source such as desalination. The Tunnel is not the answer - please take other actions.
635	Jim Rich	One such alternative to the proposed DCP is Integrated Water Management (IWM), on both a regional and statewide basis. IWM projects involve both structural projects and non-structural programs, of various sizes and time frames. They usually involve cooperation and collaboration between local, state and federal agencies and a wide range of non-governmental stakeholders. IWM programs include integrating surface and ground water supplies. IWM projects also improve regional water self-reliance, a stated goal of the current administration. Most are multi-benefit projects, providing improved water supply or quality, increased flood protection, and recreational benefits. Many IWM projects also benefit efforts to combat global climate change, as well as help society adapt to a changing climate.
635	Jim Rich	One of the drawbacks to the latest proposed Delta tunnel project is that it would crowd out much of the federal, State, regional and local funding needed to support these promising IWM projects and programs, such as FLOOD-MAR. During the past ten years local governments, plus local and regional water districts and agencies, have worked together to plan, fund, develop and operate a wide range of cost-effective IWM projects and programs. They have often leveraged their own funds with State and federal loans and grants. A massive through-Delta tunnel project would cost anywhere from $15 billion to more than$20 billion, and would dry up much – perhaps most – of the funding used to accomplish these IWM projects and programs. That is one reason why most of the local governments and water districts and agencies in California did not support the BDCP or WaterFix, and do not support the DCP.
637	Osha Meserve Local Agencies of the North Delta	References by project proponents to having the capacity to take a “big gulp “when flows are high should be matched by a commitment to take only “little sips “when flows are low. This type of operation, however, was not reflected in the CWF environmental review or modeling runs, with “big gulps” and inadequate bypass flows proposed in the summer and fall low flow months. The Draft EIR should clearly describe proposed operations that actually conform to this oft-repeated talking point, and then analyze the impacts of those operations.
637	Osha Meserve Local Agencies of the North Delta	LAND and other groups and individuals have suggested many alternatives to the north Delta tunnel concept over the last decade as well as during the last year, in the time since the CWF project was rescinded and a “new” way forward was identified. We expected that there would be a substantive discussion of alternatives prior to release of the NOP. The NOP, however, proposes basically the same project as the failed CWF project, apparently discounting those suggestions without any analysis. The Draft EIR, however, must consider a reasonable range of alternatives that would feasibly attain the identified project objectives. (CEQA Guidelines, § 15126.6.) Should DWR wish to engage in discussions regarding

		alternatives – both different configurations of conveyance as well as groupings of actions that would preclude the need for new conveyance – LAND is available for those conversations.
638	Carol Moon Goldberg League of Women Voters of CA	Despite the substitution of a single tunnel for two tunnels, we still see many problems with the tunnel conveyance project, including not
638	Carol Moon Goldberg League of Women Voters of CA	We do not see that strategies such as water conservation and wastewater reclamation have been employed to the fullest extent possible by export users to minimize reliance on the Delta, as required by the Delta Reform Act.
646	Jacklyn Shaw	We need desal in NorCal
646	Jacklyn Shaw	If any conveyance, the Delta Map Plan options need to include Delta River West Side, and that is in "compliance to wet years."
662	John McManus Golden Gate Salmon Association	Finally, the NOP indicates that the scoping process will inform operations to be analyzed in the DEIR. We strongly suggest that the DEIR include a range of operational alternatives that strengthen protections for fish and wildlife, including: (1) one or more alternatives that are consistent with the operations outlined in the SWRCB's July 2018 Framework for the Sacramento/Delta Update to the Bay-Delta Plan; (2) one or more alternatives that are consistent with the operational criteria identified by NRDC et al in its opening statement to the SWRCB for Phase 2 of the water rights proceeding for the California WaterFix project.2 These operational requirements include significant increases in Delta outflow and prohibitions on diversions from new conveyance when flows at Freeport are less than 35,000 cfs. In order to comply with state and federal laws, the proposed project must strengthen environmental protections as compared to the environmental baseline.
662	John McManus Golden Gate Salmon Association	Analyzing a full range of alternatives, including alternatives with stronger flow protections for the environment and with increased investment in alternative water supply tools, is essential to allow the public to evaluate the merits and cost-effectiveness of the proposed project. In short, the fact that DWR ignored these critical issues when analyzing the twin tunnels played a major role in that project's failure. DWR should not make the same mistake again in this DEIR.
664	Roberto Valdez	The DCP needs to clarify why the 6K-cfs tunnel needs to be built underground rather above-ground along designated plan; can the tunnel be used to reinforced Delta levees from an engineering viewpoint?
666	Bill Washburn	Please quit focusing on the tunnels and get with the real solution to the water shortage dilemma. What is needed are more reservoirs to catch the water that comes from the precipitation.
668	Jacklyn Shaw	Avoid Terminous with Tower Park and community recreation at large with aquatic sports. Originally, it was part of the Delta Heritage Act. IF ANY " FUNNEL/ CONVEYANCE, 60 feet wide for 400 miles away, it needs to BE ON WEST SIDE of the DELTA RIVER. When do we see a map plan with options, on website of DWR with water.ca.gov ?
672	Andrew McHugh	Where are water efficiencies, recycling, reclamation, storage, desalinization, and rain storage on your priorities?

676	Doug Carpenter	Please consider desalinization.
677	Jeff McCormack JT McCormack, Inc.	At a minimum volume, the alignment of this project should be moved to the Western corridor proposed by Congressman John Garamendi. The engineering costs of building new roads out West might not be as much as all the road building, rail siding construction, conveyor systems, cranes, tunnels, etc. that is required by the Eastern or Central alignment.
677	Jeff McCormack JT McCormack, Inc.	A surface pipeline would make more sense, as it would cost far less. It would just lay on the ground or be above ground like an oil or gas pipeline to let animals move under it, with jacks to raise or lower it for subsidence, and flex joints to adapt to earthquakes. It would still employ people in the construction process for economic development benefits. It would go through the habitat restoration project areas East of Rio Vista, making dual use zones, adding to the economic justification of those.
678	Marsha Armstrong	I ask that a "NO TUNNEL" alternative be included and recommended in your proposed Environmental Impact Report.
679	Chris Lish	I am writing to strongly urge the Department of Water Resources to fully include and consider a “no tunnel” alternative in the environmental impact report (EIR) of the Delta Conveyance Project.
679	Chris Lish	The EIR should analyze alternatives that increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative that analyzes the use and investment in water conservation, efficiency, and additional demand reduction measures that are less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
680	Antal Kalik	The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative. The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
681	Greg Sallee	Again no tunnels would be the best. Figure out how to pump water west from the central United States during the rain and flood seasons vs taking the little water we have now away.
682	Gail Lorimer	There are other options that have been reviewed yet we still are dealing with the tunnels coming right through our natural resources only to give more water to Southern California.
692	Mark Goble	The concept has not changed, the spirit and the goal of the original Peripheral Canal project are duplicated with “Waterfix” and again with this Delta Single Tunnel Conveyance
692	Mark Goble	I do not agree in any way with this concept, but if it must happen, lets make it a pipeline instead, above ground. Utilize State owned land along Highway 5 as much as possible and put the pipe above ground.
692	Mark Goble	Environmentally, a pipeline is by far a superior choice. It would not disturb current underwater ecosystems, and only minimally disturb habitats along its route, no waste or “re-useable material” would be created, enormous amounts of materials, fuels, equipment and manpower would be saved. The savings in construction are so obvious that this alternative must be considered.

693	Scott Braly	I am emailing to ask that you explore other options to the proposed Delta Tunnel Project.
694	Delta Counties Coalition	Feasible alternatives to a tunnel that would meet the identified project objectives must be considered in the Draft EIR. (CEQA Guidelines section 15126.6, subd. (a).) The truncated and incomplete approach to project alternatives in the prior BDCP and California WaterFix environmental review processes must not be repeated.
694	Delta Counties Coalition	A feasible alternative that improves the existing through Delta conveyance system to meet the state's water supply needs must be included in the Draft EIR. While the EIR for the California WaterFix project did include a through Delta alternative, that Alternative included components that would have significant effects on Delta Legacy towns that were unacceptable. The DCC is available to assist DWR in developing the various components of a more acceptable through Delta alternative in the draft EIR. Such an alternative would include levee improvements to ensure protection of the state's water supply infrastructure, along with other local and state infrastructure.
694	Delta Counties Coalition	The Draft EIR should also recognize that under any alternative, the Delta levees must continue to be upgraded and maintained. Use of the existing Delta levee system as water conveyance channels for the delivery of water to the pumping plants will require a plan for funding their maintenance if the Delta agriculture, infrastructure and ecology are to be protected.4In addition, the Project must be designed to protect, and preferably improve, flood protections levels in the Delta.
694	Delta Counties Coalition	Preparing the existing South Delta facilities for sea level rise and increased salinity should also be considered. The existing pumps in the South Delta are protected by levees, appear to already accommodate all but the highest sea level rise model projections for 100 years, and can be raised as necessary. In addition, brackish water desalination could be a potential adaptation to increased salinity in the South Delta under various sea level rise scenarios. Brackish water treatment is far less costly than desalination of ocean water.
694	Delta Counties Coalition	SWP and CVP implementation of the reasonable and prudent alternatives ("RPAs") in the 2008 Biological Opinion for the Coordinated Operations of the Central Valley Project and State Water Project ("BiOps") could be an important component of a through Delta Alternative. These RPAs were readopted in the 2019 BiOps. (See 2019 BiOps, p. 168 [Action 4, which applies to Delta Smelt and Critical Habitat, not modified].) Specific actions contemplated under both the 2008 and 2019 BiOps include modifying the Delta Cross Channel gate operations to reduce diversions of protected fish from the Sacramento River, as well as improving fish screening and salvage operations to reduce mortality from entrainment and salvage from existing facilities. (2008 BiOps, p. 630 (Actions 4.1 and 4.4).) RPAs such as Actions 4.1 and 4.4 would meet Project objectives such as keeping water deliveries consistent with the federal Endangered Species Act. Studies carried out to implement Actions 4.1 and 4.4 concluded that a bubble curtain "could be used to successfully guide Chinook salmon away from Georgiana Slough, or a similar structure could be installed in other river junctions to move fish towards low-risk migration corridors."7Thus, non-physical barriers should be considered as a means to reduce the entry of fish into the South Delta, in combination with other "through Delta" conveyance improvements. An effective non-physical barrier using sound, air bubble curtain, and strobe light components, for instance, could be deployed at the confluence of the Georgiana

		Slough and the Sacramento River to deter fish from entering the Georgiana Slough. This would make fish less susceptible to entertainment in the South Delta. Improving fish population size through use of non-physical barriers could ultimately provide some of the "flexibility to improve aquatic conditions" that the Project seeks to achieve.
694	Delta Counties Coalition	In addition, the installation of fish screens operable at low flows at the existing Clifton Court Forebay facilities is a potential action that could reduce fish salvage and predation losses, leading to reduced mortality of sensitive species and increasing water supply reliability. Installation of Clifton Court Forebay fish screens was identified as a potential Early Action in SB7x-1 (Water Code, § 85085, subd. (c).) In 2010, Contra Costa Water District and others suggested that DWR consider screens that would operate at low-flow (diversions < 2,000 cfs) to reduce fish mortality at the existing Clifton Court Forebay. However, the feasibility studies for this action were never completed, ostensibly in favor of work on the twin tunnels project.
694	Delta Counties Coalition	From information developed in the California WaterFix CEQA process, it is clear that the currently proposed intake locations would have significant impacts to the environment, including impacts to cultural resources as well as surface water, groundwater supplies and agriculture, among other impacts. The Draft EIR should evaluate alternative intake locations that could lessen these significant impacts.
694	Delta Counties Coalition	Options should also be considered that allow natural flows to pass through as much of the Delta as possible before surplus water is extracted. In this way, the conveyance system could be self-regulating and assure protection of water rights priorities because water could only be exported downstream of other users and likely when salinity levels are low, i.e. "during high flow events." (NOP, p. 3.) Such a location would help restore a more natural pattern of flows through the Delta, consistent with the DWR objective to "improve aquatic conditions" and the Delta Reform Act's "coequal goals" of "providing a reliable water supply for the State while restoring the Delta's ecosystem." Surplus water could then be stored in expanded or newly constructed storage south-of-Delta. Western Delta locations owned by the state or water contractors would also be more suitable for use than privately owned property in the northern Delta..
694	Delta Counties Coalition	Though the size and cost of the currently proposed Project is massive, it does not create any new water nor provide for protection of the Delta environment. DWR could approach building a smaller conveyance system paired with other system improvements in various ways. An alternative could combine repair and improvement of Delta levees to improve "through Delta" conveyance, with strategic use of new and expanded existing storage facilities. A much smaller conveyance system could potentially be paired with these improvements to deliver some minimal amount of Sacramento River water needed for public health and safety.
694	Delta Counties Coalition	In addition, DWR must fully consider and evaluate a realistic No Project Alternative, including the compliance of the SWP and CVP with all existing permit conditions and regulatory requirements. This would include the RPAs relating to reduction of take at the existing facilities as well as creation of required habitat to meet the SWP and CVP Endangered Species Act permit conditions. While implementation of these requirements has been inexplicably delayed, the No Project Alternative in the Draft EIR must assume

		that all legally required protections will be pursued and met. In addition, the no Project Alternative should include compliance with all adopted Water Quality Control Plan requirements.
698	Steve Lambert Butte County Board of Supervisors	DWR should consider non-conveyance alternatives. Many of the proposed DCP objectives could be met through actions other than a new Delta conveyance. The alternatives analysis of the DCP EIR should not be limited to alternative conveyance options. For example, the proposed improvement of levees and establishing setback levees could meet the objectives of the DCP. The objective to protect water supply reliability can be met through actions other than a thorough Delta conveyance. South of Delta water exporters must follow state policy by reducing their reliance on the Delta and manage water available. The intended objective to provide operational flexibility to improve aquatic conditions has been previously show to result in more harm to aquatic species that provide protection.
700	Melanie Barna	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	The Draft EIR must study a reasonable range of alternatives that do not require construction of new conveyance facilities in the Delta.
702	Frank Toriello We Advocate Through Environmental Review	The EIR must analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets that the tunnel project proposes (and likely would be cheaper).
704	Eric Jenks Wilbur-Ellis Company	The Delta Conveyance Project can and should be done without impacting the Twin Cities facility. The EIR should consider and analyze such alternatives. •5.a. DCA Site Plans. As noted above, the DCA Site Plans show two possible tunnel alignments: a Central Corridor and an Eastern Corridor, both of which tentatively show a "Launch Shaft Site" immediately adjacent to and impacting Wilbur-Ellis's Twin Cities facility. These maps show the Twin Facilities property may be used as a "Twin Cities Support Site" for Project-related "Deliveries, Employee Parking, Batch Plant, Offices, Segment Storage, RTM Loading." By DCA's own admission, it developed the DCA Site Plans using ranking criteria "based on engineering considerations," not environmental or socioeconomic considerations; and it is DWR's role to "evaluate sites based on environmental analysis in the CEQA process." See DCA Stakeholder Engagement Committee Meeting Summary, Feb. 12, 2020, available athttps://www.dcdca.org/pdf/02142020-SECMeetingSummary.pdf. For all the reasons discussed above, DWR should not choose a launch shaft site that potentially disrupts or closes the Twin Cities facility, because doing so would cause serious adverse impacts. Alternative locations

		for launch shafts (as discussed immediately below) would avoid these significant impacts, while still meeting project objectives.
704	Eric Jenks Wilbur-Ellis Company	As shown by the DCA 2/12/20Presentation, there are many feasible—indeed, many potentially favorable—locations for launch sites that, by avoiding the vicinity of the Twin Cities facility, would eliminate or reduce the impact to agricultural resources and other impacts noted above. Notably, the 2/12/20Presentations shows: The total tunnel length is about 40 miles. (p. 31.) Only 2 to 3 launch shafts will be needed over the course of these 40 miles. (p. 31.) for these 40 miles, there are many feasible alternative locations for launch shafts in both corridors which would avoid or substantially lessen environmental impacts. (p.37.) This is especially true for the eastern corridor, where virtually the entire 40-milecorridor is colored green as "favorable" for launch shafts. (p. 37.) for Launch Site A (the northernmost launch shaft) in which the Twin Cities facility is located, DCA's maps show a large area—seemingly about 3 miles wide (3 miles westward from Interstate 5), and 5-6 miles long (from south of Courtland to south of Walnut Grove) that is "favorable" (colored green) for launch shafts. (p. 37 and p. 42.) Even if 400 acres is needed for temporary construction staging and material storage at each launch site (as per NOP, at 5), this would be 0.625 square miles that's required—a small fraction of the area identified as favorable for Launch Shaft A. DWR should analyze alternative locations for the northernmost launch shaft that do not potentially impact the Twin Cities facility.
704	Eric Jenks Wilbur-Ellis Company	The NOP notes that launch shaft sites permanently require just 4 acres, but that "up to about 400 acres [are needed] for construction staging and material storage." NOP, 5. Using such a large area for staging and material storage has potentially much larger impacts on the environment, especially if the Twin Cities facility is potentially disrupted or closed as a result. DCA's 2/12/20 Presentation (pp. 35-36)shows alternatives are available that would require less acreage for material storage: specifically, the surface area needed for stockpile/storage could be reduced by (i) constructing a narrow tunnel, or using shorter drive lengths (thus resulting in less RTM at a given launch site); (ii) piling stored RTM higher on the stockpile site; (iii) choosing not to stockpile the entire volume of RTM produced; and/or (iv) hauling RTM off-site for beneficial re-use as the tunnel is excavated. DWR should analyze these and other alternatives for reducing the acreage required for storage at launch shafts, which would avoid any potential impacts to agricultural resources from disrupting or closing the Twin Cities facility.
705	Roger Mammon	Why does the NOP not have strengthening Delta levees as a priority.
709	Daniel Bacher	Rather than building the Delta Tunnel, we need to look at sustainable alternatives such as the Environmental Water Caucus Responsible Exports Plan. We need to support sustainable alternatives to ecosystem restoration and water supply reliability that will restore our salmon, steelhead, striped bass, sturgeon, American shad and other valuable fisheries, based on upholding the public trust and public interest, rather than destroying them.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin	We strongly encourage the EIR to support a No Project option for the Delta Conveyance Project. This project does not make any sense economically, environmentally, or for water sustainability. It is state law to reduce reliance on the Delta and reduce transfers out of the Delta. The State needs to uphold that law. There are many other water projects that can create new water resources, better use our current water

County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	resources, and create water sustainability in our growing state. The following are alternative projects that we request that the EIR address. •Dredging rivers. Over time, sedimentation has built up in many of our rivers and sloughs. Some are so full that water can't properly move through the channels. By dredging the rivers and sloughs in the Sacramento and San Joaquin River systems to their original depth, less riverside water pressure will be placed on our levees. This reduction of pressure will extend the longevity of the levees and reduce breaching during flood periods with more channel space to hold and move storm water. Dredging will also provide a rocky bottom surface which is helps protect fish eggs and young fry from predators. Dredging equals more depth and cooler water which results in better water. •Above Ground Storage. The Sites Reservoir objective is to collect storm water during high water events and store that water until room is available in other water storage facilities or as needed by water users. The water being stored in this facility is only excess water that can't be captured to store and otherwise would have flowed out to the ocean. Sites would cost $4.4 billion in capital with 500,000 AFY (acre-feet/year) and have a capacity of 1,800,000 AF (acre-feet). The Temperance Flat Reservoir would have a capacity of 1,300,000 AF and provide 183,000 AFY. Temperance Flat would cost $2.8 billion in capital. The Los Vaqueros Reservoir Expansion would cost $800 million in capital to increase the 160,000 AF reservoir to 275,000 AF. The San Luis Reservoir Expansion would increase the reservoir by 130,000 AF at a cost of $360 million in capital. •Desalination. We need to get the large metropolitan cities along the coast to utilize desalination. Desalination plants are a reliable drought proof water source. The Carlsbad Desalination Plant was constructed within a 3-year timeframe and provides more than 50 million gallons of new fresh water every day to serve 400,000 people in San Diego County. This project covers a smaller footprint, reduces that area's dependence to import water, but is a reliable local water resource to already supply one-third of their county's water needs. The Delta Conveyance Projects will take over a decade to construct, and still not guarantee any water as it doesn't create or store water. It will only transfer water that may be available, which during drought, could be an empty tunnel that taxpayers will still be paying money for. At least with a desalination plant, when taxpayers are paying for the facility, water will be created. In addition, the Carlsbad Desalination Plant uses energy recovery devices that recycles the pressure from the reverse osmosis process to save an estimated 146 million kilowatt-hours of energy every year and reducing carbon emissions by 42,000 metric tons every year. Desalination is a start in securing California's water sustainability, especially for coastal cities. As more desalination plants become operational, since they are pulling seawater to make fresh water, they can have a small effect on the expected rising sea level with climate change. There are several proposed desalination projects that need to be supported over the Delta Conveyance Project as these projects create new water and at a lower cost. Some of these desalination projects are listed here, but there are also many others being proposed. The East Bay Municipal Utilities District's project for the Bay Area would create 22,000 AFY costing $168.5 million in capital. The Soquel Creek Water District's project for the Central Coast would create 5,000 AFY for a cost of $115 million in capital. The DeepWater, LLC's project for the Central Coast would create 28,000 AFY costing $350 million in capital. The People's Moss Landing Water Desal Project on the Central Coast would create 11,000 AFY for a cost of $129 million in capital. The California American Water's project on the Central Coast would create 11,000 AFY for a cost between $320-370 million in capital. The Seawater Desalination Vessel Project

		on the Central Coast would create 22,000 AFY at a cost of $185 million in capital. The Municipal Water District of Orange County's project would create 17,000 AFY for a cost of $175 million in capital. The Poseidon Resources/San Diego County Water Authority's project would create 56,000 AFY costing $870-970 million in capital. •Recycled Water. With a little investment at each local area, many areas can make a big impact on water sustainability. The Metropolitan Water District of Southern CA Water Recycling Project will recycle 168,000 AFY with a capital cost of $1 billion. The Pico Rivera Project in Southern California would recycle 21,000 AFY with $95 million in capital. Los Angeles County's project would also recycle 171,000 AFY with $95 million in capital. The East Valley Water District's project in Southern California would recycle 7,000 AFY with$4.5 million in capital. The Paso Robles project would recycle 3,000 AFY with just $18million in capital. •Recharge. California has a great natural water storage already underground. Over the years the natural recharge has decreased as the State continually tries to direct and funnel water into channels, along with the technological advances in agriculture to reduce water use through micro irrigation. In addition, many areas are also pumping more water out of the basin than it can naturally recharge. There are years and times of the year, when stormwater is available to allow to flood over fields and seep slowly into the ground. These opportunities are readily available, low cost, and just need to be supported and promoted. In the long run, this will help our groundwater basins to come into balance, provide the state with a readily available water source during years of drought, lower dependence on surface water diversions, and is ecologically beneficial. •Support the passage of legislation to allow groundwater storage to be considered a beneficially use. Currently, storing water as groundwater in not considered a beneficial use and with the establishment of SGMA, is contradictory. For SGMA to achieve balance and sustainability, water must be allowed into the groundwater basin. Yet, legislatively, recharging a groundwater basin is limited as it's not deemed a beneficial use. Where natural flooding events and agricultural flood irrigation practices actually supplied time for water to soak in and recharge the groundwater basin, today's practices of micro irrigation to conserve water and the channeling of natural flood events has all but eliminated the ability for water to seep into the soil and down into the groundwater basin. Our technology, while great for conservation and flood safety, has impaired our groundwater basins and hurt the surrounding natural environment on river flows and drier soil surface from lower groundwater tables.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	By supporting a No Project option for the Delta Conveyance Project and to instead find better and more economical alternatives to provide new and sustainable water resources, all four of the project objectives to improve the SWP Delta Conveyance system will be achieved, provide more functionality to support the State's Water Resilience Portfolio, and protect and benefit all Californians properly.
714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The EIR should analyze water conservation and efficiency, and in addition, demand reduction measures that would be less environmentally harmful and more economical than the tunnel, which would achieve the same water supply reliability goals and targets.

714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The Department of Water Resources must investigate serious alternatives, including a no tunnel alternative that could address the main objectives of this project without any additional water diversions. Input from tribes, traditional ecological knowledge, and the recommendations in the Environmental Water Caucus' "A Sustainable Water Plan for California," should be required in developing a no tunnel alternative.
715	Daniel Wilson Reclamation District 3	The proposed project is projected to cost $12 billion, to meet this and other objectives. This objective could also be met by improvements to the existing levee system for a much lower investment. Investments must be made in the levee system regardless.
715	Daniel Wilson Reclamation District 3	The EIR must include a comprehensive discussion of the alternative locations of the water conveyance facilities that will reduce or avoid the substantial impacts expected to occur within the north Delta if the facilities are located there. Evaluate alternative size and configurations, and impacts associated with each option.
715	Daniel Wilson Reclamation District 3	The following are other feasible alternatives that meet the listed project objectives and must be included in the EIR: Improve levees to a seismic standard Consider an intake at Sherman Island Consider Congressman Garamendi's "Little Sip/Big Gulp" that utilizes the Deep Water Ship Channel.
718	David Strecker San Joaquin Farm Bureau Federation	We strongly encourage the EIR to support a No Project option for the Delta Conveyance Project. This project does not make any sense economically, environmentally, or for water sustainability. It is state law to reduce reliance on the Delta and reduce transfers out of the Delta. The State needs to uphold that law. There are many other water projects that can create new water resources, better use our current water resources, and create water sustainability in our growing state. The following are alternative projects that we request that the EIR address. •Dredging rivers. Over time, sedimentation has built up in many of our rivers and sloughs. Some are so full that water can't properly move through the channels. By dredging the rivers and sloughs in the Sacramento and San Joaquin River systems to their original depth, less riverside water pressure will be placed on our levees. This reduction of pressure will extend the longevity of the levees and reduce breaching during flood periods with more channel space to hold and move storm water. Dredging will also provide a rocky bottom surface which is helps protect fish eggs and young fry from predators. Dredging equals more depth and cooler water which results in better water. •Above Ground Storage. The Sites Reservoir objective is to collect storm water during high water events and store that water until room is available in other water storage facilities or as needed by water users. The water being stored in this facility is only excess water that can't be captured to store and otherwise would have flowed out to the ocean. Sites would cost $4.4 billion in capital with 500,000 AFY (acre-feet/year) and have a capacity of 1,800,000 AF (acre-feet). The Temperance Flat Reservoir would have a capacity of 1,300,000 AF and provide 183,000 AFY. Temperance Flat would cost $2.8 billion in capital. The Los Vaqueros Reservoir Expansion would cost $800 million in capital to increase the 160,000 AF reservoir to 275,000 AF. The San Luis Reservoir Expansion would increase the reservoir by 130,000 AF at a cost of $360 million in capital. •Desalination. We need to get the large metropolitan cities along the coast to utilize desalination. Desalination plants are a reliable drought proof water source. The Carlsbad Desalination Plant was constructed within a 3-year timeframe and provides more than 50 million gallons of new fresh water every day to serve 400,000 people in San Diego County. This project covers a smaller footprint, reduces that

area's dependence to import water, but is a reliable local water resource to already supply one-third of their county's water needs. The Delta Conveyance Projects will take over a decade to construct, and still not guarantee any water as it doesn't create or store water. It will only transfer water that may be available, which during drought, could be an empty tunnel that taxpayers will still be paying money for. At least with a desalination plant, when taxpayers are paying for the facility, water will be created. In addition, the Carlsbad Desalination Plant uses energy recovery devices that recycles the pressure from the reverse osmosis process to save an estimated 146 million kilowatt-hours of energy every year and reducing carbon emissions by 42,000 metric tons every year. Desalination is a start in securing California's water sustainability, especially for coastal cities. As more desalination plants become operational, since they are pulling seawater to make fresh water, they can have a small effect on the expected rising sea level with climate change. There are several proposed desalination projects that need to be supported over the Delta Conveyance Project as these projects create new water and at a lower cost. Some of these desalination projects are listed here, but there are also many others being proposed. The East Bay Municipal Utilities District's project for the Bay Area would create 22,000 AFY costing $168.5 million in capital. The Soquel Creek Water District's project for the Central Coast would create 5,000 AFY for a cost of $115 million in capital. The DeepWater, LLC's project for the Central Coast would create 28,000 AFY costing $350 million in capital. The People's Moss Landing Water Desal Project on the Central Coast would create 11,000 AFY for a cost of $129 million in capital. The California American Water's project on the Central Coast would create 11,000 AFY for a cost between $320-370 million in capital. The Seawater Desalination Vessel Project on the Central Coast would create 22,000 AFY at a cost of $185 million in capital. The Municipal Water District of Orange County's project would create 17,000 AFY for a cost of $175 million in capital. The Poseidon Resources/San Diego County Water Authority's project would create 56,000 AFY costing $870-970 million in capital. •Recycled Water. With a little investment at each local area, many areas can make a big impact on water sustainability. The Metropolitan Water District of Southern CA Water Recycling Project will recycle 168,000 AFY with a capital cost of $1 billion. The Pico Rivera Project in Southern California would recycle 21,000 AFY with $95 million in capital. Los Angeles County's project would also recycle 171,000 AFY with $95 million in capital. The East Valley Water District's project in Southern California would recycle 7,000 AFY with$4.5 million in capital. The Paso Robles project would recycle 3,000 AFY with just $18million in capital. •Recharge. California has a great natural water storage already underground. Over the years the natural recharge has decreased as the State continually tries to direct and funnel water into channels, along with the technological advances in agriculture to reduce water use through micro irrigation. In addition, many areas are also pumping more water out of the basin than it can naturally recharge. There are years and times of the year, when stormwater is available to allow to flood over fields and seep slowly into the ground. These opportunities are readily available, low cost, and just need to be supported and promoted. In the long run, this will help our groundwater basins to come into balance, provide the state with a readily available water source during years of drought, lower dependence on surface water diversions, and is ecologically beneficial. •Support the passage of legislation to allow groundwater storage to be considered a beneficially use. Currently, storing water as groundwater in not considered a beneficial use and with the establishment of SGMA, is contradictory. For SGMA to achieve

		balance and sustainability, water must be allowed into the groundwater basin. Yet, legislatively, recharging a groundwater basin is limited as it's not deemed a beneficial use. Where natural flooding events and agricultural flood irrigation practices actually supplied time for water to soak in and recharge the groundwater basin, today's practices of micro irrigation to conserve water and the channeling of natural flood events has all but eliminated the ability for water to seep into the soil and down into the groundwater basin. Our technology, while great for conservation and flood safety, has impaired our groundwater basins and hurt the surrounding natural environment on river flows and drier soil surface from lower groundwater tables.
718	David Strecker San Joaquin Farm Bureau Federation	By supporting a No Project option for the Delta Conveyance Project and to instead find better and more economical alternatives to provide new and sustainable water resources, all four of the project objectives to improve the SWP Delta Conveyance system will be achieved, provide more functionality to support the State's Water Resilience Portfolio, and protect and benefit all Californians properly.
720	Eric Gillies State Lands Commission	Alternatives: The Draft EIR should evaluate any and all possible alternatives to reduce temporary and permanent impacts as a result of the proposed Project construction. A description of the Preferred Project as well as the environmentally superior alternative should be clearly identified and evaluated with mitigation to reduce significant impacts to the lowest possible level.
721	Michael McDowell Double M Farms	There are numerous alternatives that can provide new water resources, not impact the Delta, and are cost effective that the state continues to overlook.
721	Michael McDowell Double M Farms	I request that the EIR include several of the alternative proposed projects out there that would reduce water reliance on the Delta and assist with CA's need for water sustainability.
721	Michael McDowell Double M Farms	I strongly encourage the EIR to support a No Project option for the Delta Conveyance Project.
721	Michael McDowell Double M Farms	The following are projects that I request that the EIR address: dredging rivers, Sites Reservoir, desalination, recharge, support legislation to allow groundwater storage to be considered a beneficial use.
723	Charlene Woodcock	Much the most equitable, cost-effective, and environmentally responsible solution to the need to distribute California's water fairly to all is a regime of much greater efficiency in its use and its storage, consistent and widespread means of filtering waste water for reuse outdoors, and restrictions against water-needy crops.
724	Harvey Correia Reclamation District 2067	The proposed project is projected to cost $12 billion, to meet this and other objectives. This objective could also be met by improvements to the existing levee system for a much lower investment. Investments must be made in the levee system regardless.
724	Harvey Correia Reclamation District 2067	The EIR must include a comprehensive discussion of the alternative locations of the water conveyance facilities that will reduce or avoid the substantial impacts expected to occur within the Pearson District if the facilities are located there. Evaluate alternative size and configurations, and impacts associated with each option. The size of the forebay should also be seriously reconsidered, as should the need for the forebay at all, particularly in light of local impacts such as a massive water regulating facility upon the District.

724	Harvey Correia Reclamation District 2067	The following are other feasible alternatives that meet the listed project objectives and must be included in the EIR: Improve levees to a seismic standard Consider an intake at Sherman Island Consider Congressman Garamendi's "Little Sip/Big Gulp" that utilizes the Deep Water Ship Channel.
725	Susan Wilson	In order for the State of California to properly manage its water, we need to focus our efforts and money on sufficient water storage.
727	Victoria Allen	I would like to suggest that alternatives to the tunnel project for the conveyance of water be considered.
729	Erik Vink Delta Protection Commission	Improve Levees and Reduce Reliance on Exports The EIR should consider an alternative that reduces risks to Delta water supplies from earthquakes and sea level rise by improving Delta levees, as recommended in the Commission's Economic Sustainability Plan for the Sacramento-San Joaquin Delta (ESP). This alternative should consider a reduction of other region's reliance on water from the Delta by investing in water use efficiency, water recycling, and other advanced technologies. EIR alternatives and mitigation measures should also be consistent with regulations implementing the Delta Reform Act, the Clean Water Act, and the Davis Dolwig Act's (Water Code sections 11910-11911) requirements about protecting Delta wildlife and fish, providing recreation opportunities, and consulting with local agencies.
729	Erik Vink Delta Protection Commission	The EIR should examine these alternatives, which we believe may avoid or reduce the adverse effects to Delta resources enumerated in the subsequent sections. Improve through-Delta conveyance and reduce reliance on exports. The Delta Protection Commission advocates improved through-Delta conveyance, rather than the isolated facility proposed by DWR. In recognition of our recommendation and because the project proposed by DWR addresses only some of the factors that contribute to the unreliability of Delta water exports, the EIR should also include an alternative that promotes water reliability by strengthening Delta levees and dredging key Delta channels, rather than tunneling under the Delta, while also reducing other region's reliance on water from the Delta by investing in water use efficiency, water recycling, and other advanced technologies. The through-Delta conveyance components of this alternative should include all the features recommended in the Delta Plan (Delta Plan recommendation WR R12(a)(4)and (c)). This alternative's provisions to reduce reliance on the Delta should be informed by an analysis of water demand and promising alternative supplies in areas to be served by the project. The analysis should comply with the Delta Plan's regulatory policy WR P1. The alternative should also be informed by analyses highlighting southern California's increasingly diverse water supplies and further opportunities to reduce imports there (https://www.nrdc.org/experts/doug-obegi/mwd-suggests-southern-california-has-too-much-water; https://www.nrdc.org/experts/ben-chou/new-report-finds-big-mismatches-socal-water-plans) and in the San Joaquin Valley (https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-february-2019.pdf).
729	Erik Vink Delta Protection Commission	Far eastern alignment. A tunnel alternative deserving evaluation is the far eastern alignment recommended in the January 20, 2020 report of the Independent Technical Review (ITR) Panel to the Delta Conveyance Design and Construction Authority (DCA). We understand that a similar alignment was proposed in 2010 by an ITR Panel for the WaterFix tunnels. In addition to the cost and logistical advantages identified by the panel, such an alignment would seem to avoid or reduce impacts to land use, recreation(including boating),and Highway 160 corridor cultural resources from noise, traffic, and

		construction disruption. Mitigation of remaining impacts would appear to be less complex and thus perhaps less expensive as well. However, the potential impacts of the far eastern alignment have not been as thoroughly studied as the central corridor alignment in terms of agriculture, natural resources and land use conflicts. For example, the far eastern alignment could have potential significant adverse impacts to the Port of Stockton and adjacent neighborhoods.
729	Erik Vink Delta Protection Commission	Alternative points of diversion. Because construction of diversion facilities causes such significant impacts to nearby Delta communities and natural and cultural resources in the Sacramento River/Highway 160 corridor, alternative diversion locations that avoid or reduce damage to Delta communities and recreational boating as well as protect fish should be considered. In addition, the analysis of potential diversion points undertaken in the BDCP/WaterFix EIR's Appendix 3F should be revisited with impacts to Delta communities weighted equally with impacts to fish and wildlife. Experts in Delta land use should be represented on the ranking panel equally with fish agency representatives. Relying on fish biologists, who are not trained in land use, cultural resources, or other relevant topics to weigh impacts on Delta communities does not employ the best available science. Use of a single point of diversion with a total project capacity of 3000 cfs should also be considered, thereby reducing the extent of damage from multiple points of diversion.
729	Erik Vink Delta Protection Commission	Alternative intermediate forebay locations. To avoid or reduce impacts from noise and construction disruption near Locke and the Cosumnes River Preserve and damage that dredging and barge facilities would inflict on recreational boating, aesthetics, and Snodgrass Slough's natural areas, an alternative location for the intermediate forebay and associated facilities should be evaluated south of Walnut Grove Road and adjacent to I-5along the far eastern alignment. Such a site would still involve painful damage, but perhaps less harm than the site currently under consideration.
730	Reclamation District 551	The proposed project is projected to cost $12 billion, to meet this and other objectives. This objective could also be met by improvements to the existing levee system for a much lower investment. Investments must be made in the levee system regardless.
730	Reclamation District 551	The EIR must include a comprehensive discussion of the alternative locations of the water conveyance facilities that will reduce or avoid the substantial impacts expected to occur within the Pearson District if the facilities are located there. Evaluate alternative size and configurations, and impacts associated with each option.
730	Reclamation District 551	The following are other feasible alternatives that meet the listed project objectives and must be included in the EIR: Improve levees to a seismic standard Consider an intake at Sherman Island Consider Congressman Garamendi's "Little Sip/Big Gulp" that utilizes the Deep Water Ship Channel.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must fully analyze whether, and how or how-not, alternative locations for the proposed intakes, and other components of the Project, would lessen impacts on the District, the Mission of Clarksburg Fire, the Clarksburg Community, and the North Delta.

731	Mark Pruner Clarksburg Fire Protection District	The EIR must show sites, other than the three proposed intakes, considered by the Fish Facilities Technical Team were determined to be less impactful on the District, the Mission of Clarksburg Fire, the Clarksburg Community, and the North Delta.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must fully analyze whether, and how or how-not, alternative locations for the proposed intakes, and other components of the Project, would lessen impacts on the Old Schoolhouse and the Old Schoolhouse Project than the currently proposed northernmost proposed intake.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must fully show how sites, other than each of the three proposed intakes, considered by the Fish Facilities Technical Team were determined to be less impactful on the Clarksburg Community where the Old Schoolhouse and Old Schoolhouse Project are sited.
733	Tom Williams	Alternatives reducing reliance on the Delta required by Delta Reform Act
734	Richard Denton	The EIR must analyze a full range of alternatives
734	Richard Denton	The EIR must analyze a holistic Delta solution comprising of a portfolio of actions.
734	Richard Denton	The EIR must analyze alternatives that implement enhanced Delta outflows consistent with the SWRCB's 2010 Delta Flow Criteria Report
734	Richard Denton	The EIR alternatives must include Fall X2 objectives
734	Richard Denton	The EIR must include alternatives where the SWP export diversions to Clifton Court Forebay are fully screened
734	Richard Denton	The EIR must include alternatives that operate to the existing SWRCB Bay-Delta standards, state and federal biological opinions and U.S. Army Corps of Engineers permits.
736	Kelley Taber County of Sacramento	The County is deeply disappointed and discouraged that DWR once again is proceeding with a Delta tunnel in lieu of more environmentally sensitive, cost-effective alternatives for improving water supply reliability. The Project as described in the NOP is virtually identical to its predecessor, the California WaterFix, despite Governor Newsom's express direction less than nine months before the NOP was released to assess new Delta conveyance as part of a comprehensive approach to water resource management.
736	Kelley Taber County of Sacramento	1. Any water supply reliability plans for areas south of the Delta must: Not redirect unmitigated adverse environmental, social, or economic impacts to the County; Honor and adhere to water right priorities and area-of-origin protections; Have no adverse effect on the existing and future operations of the Sacramento Regional County Sanitation District facilities or the FRWP; Fully mitigate any other adverse impacts of water conveyance facilities routed through the County, with County staff fully involved with the routing and operational issues for such facilities within the County; Protect the County's governmental prerogatives in the areas of its local land use and permitting authority, public health and safety, and agricultural stability; Be consistent with the County's land use planning, economic development, including agriculture, and the South County Habitat Conservation Plan (HCP); Commit financial resources to maintain and enhance vital transportation, flood control infrastructure, and emergency response resources

		within those areas of the Sacramento County Delta, and Account for the multiple causes of the Delta's decline and not simply focus on one or a limited number.
736	Kelley Taber County of Sacramento	CEQA requires that DWR consider a reasonable range of alternatives to the Project capable of avoiding or substantially lessening its significant impacts. As demonstrated by the WaterFix EIR and the County's evidence submitted in the WaterFix water rights change petition hearing, the Project facilities are all but certain to result in dozens of significant unavoidable impacts both from facility construction and diversion of substantial amounts of water in the north Delta. The NOP includes no information about how the proposed Project would be operated, merely identifying a potential range of diversion routes. However, given its similarity to the WaterFix, the Project has the potential for significant impacts to the quality and reliability of water supplies for Delta water users. A robust evaluation of alternatives is essential.
736	Kelley Taber County of Sacramento	The proposed intake locations threaten significant impacts to cultural and historic resources, community health and welfare, the SRWTP, FRWP, Town of Hood wells, and surface and groundwater supplies. DWR staff have represented in Project scoping meetings that there are no available alternative intake locations due to fish concerns. This is inaccurate and contradicted by information developed in the WaterFix CEQA process. Moreover, such statements suggest that DWR has improperly prejudged the scope of its alternatives analysis such that the Draft EIR may be no more than a post-hoc rationalization for the Project.
736	Kelley Taber County of Sacramento	Information in the WaterFix EIR Appendix 3F, Intake Location Analyses (pp. 3.F.6 - 3.F.8), relying on the Fish Facilities Technical Team report, indicates that there are suitable intake locations farther downstream below Steamboat Slough (identified as intakes 6 and 7). Moving intakes farther south on the Sacramento River would reduce the potential for conflicts with and significant impacts to SRWTP operations, and thus the FRWP operations, as well as Town of Hood wells, and have the benefit of being better for salmon.
736	Kelley Taber County of Sacramento	Moving the intakes to avoid impacts to the FRWP and SRWTP also would avoid significant impacts to tribal cultural resources identified by Miwok Tribal government representatives at the February 26, 2020 Delta Stakeholder Engagement Committee meeting, where DWR staff was informed that all three intakes are highly sensitive to the Miwok and include several village sites and more than 5 burial grounds.
736	Kelley Taber County of Sacramento	The ITRP identified significant problems with feasibility, including road and transportation impacts, from both of the tunnel corridor options described in the NOP. The panel thus recommended an alternative tunnel alignment, much closer to Interstate 5, indicating this alignment is potentially feasible. (See Exhibit A, p. 8.)
736	Kelley Taber County of Sacramento	Given the many impacts, and Delta Reform Act mandates, the EIR also should fully evaluate both a non-structural alternative that includes water reclamation, localized desalination and increased capture and storage of localized rainfall in lieu of continued or increased Delta exports, as well as a reasonable range of alternative intake locations
740	Ryan Hernandez Contra Costa County Water Agency	The EIR should analyze a full range of alternatives including a through Delta Conveyance, improving existing facilities with a smaller conveyance system and a realistic evaluation of the No Project alternative.

743	The Environmental Council of Sacramento	Appropriate alternatives must be considered for the project as a whole The "no project" alternative should not be the only one considered and analyzed. Alternatives are circulating that would either remove the need for the Delta Conveyance or dramatically decrease its impacts. The Sierra Club's Sensible Water Management Portfolio Smart Tunnel Alternative should be included as an alternative for analysis. This alternative would provide equivalent benefits without the need for expensive new infrastructure and avoid the significant and unavoidable impacts of the tunnel infrastructure. Other appropriate alternatives to analyze should include: John Garamendi's "Little Sip, Big Gulp", Robert Pyke's Western Delta Intake concept, reverse osmosis of brackish water currently conveyed to Southern California water districts via the California Water Project, and extensive water conservation efforts so that that the tunnel is not needed
743	The Environmental Council of Sacramento	Appropriate Alternatives must be considered for infrastructure components The extraordinary scale and complexity of this project requires analysis of alternatives to individual components of the planned infrastructure. At a minimum, this includes the intakes, launch shafts, access shafts, and forebays. These alternatives need to include geographic placement, engineering design, and timing of construction. As an example, the three intakes that the SEC was requested to provide feedback on were not balanced with other possible geographic placements or discussions about the tradeoffs involved in selecting those particular placements. Different designs and geographic placements for these intakes could result in greatly reduced impacts and need to be considered. Similarly, the other infrastructure components also need analyses of alternatives that could avoid and minimize environmental impacts. Engineering and technical concerns have largely driven the geographic placement, design, and construction timing of the infrastructure components. Different geographic placements, designs, and construction timing, that have fewer significant and unavoidable environmental impacts, need to be included in the selection and analysis of alternatives to the specific infrastructure components.
743	The Environmental Council of Sacramento	Impact of mechanically assisted flows in the tunnels need to be analyzed Pressurized pumping of water into and through the Delta Conveyance needs to be analyzed. It cannot be assumed that the Conveyance will continue to utilize gravity flow in perpetuity
744	Shivaji Deshmukh Inland Empire Utilities Agency	In an effort to further contribute to statewide water supply sustainability, IEUA is pursuing the implementation of the Chino Basin Program (CBP), an innovative and first-of-its-kind approach for delivering benefits to both the northern and southern parts of the State through water exchange, new recycled water supply development, and valuable new infrastructure and upgrades. In 2018, IEUA was awarded conditional funding of $206.9 million from a chapter of Proposition 1, a state water bond approved by voters in 2014 that provided funding for new water storage projects. The CBP involves the construction of an advanced water treatment facility and distribution system that will treat and store up to 15,000 acre-feet per year of recycled water in the Chino Basin, thus creating a new local water supply. In partnership with a State Water Project Contractor, this water would be exchanged in blocks of up to 50,000 acrefeet per year towards ecosystem benefits north of the Delta for 25 years. With innovative approaches like the CBP, southern Californian water agencies like IEUA are committed to finding sustainable pathways for future water supply reliability. Imported water remains the backbone system, however, that allows the region to invest in local supply projects and to maintain vital water storage reserves for dry years. As such,

		IEUA supports the proposed single-tunnel Delta Conveyance Project conveying a minimum of 6,000 cubic-feet-per-second (cfs) of water supply to ensure the ongoing reliability of State Water Project deliveries to our region via MWD. Because water agencies will fund the costs of the proposed project, IEUA emphasizes the importance of achieving cost-effective approaches and requests that the Department of Water Resources consider explicitly stating a commitment to a cost-effective project in the end of project purpose statement. Additionally, if the capacity of the tunnel were reduced below 6,000 cfs, IEUA is concerned that the costs would outweigh the benefits. As such, IEUA supports conveyance approaches promoting maximum conveyance capacity.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Real alternatives must be developed and considered that would not cause or worsen these significant adverse impacts because freshwater flows would not be diverted into a Tunnel Project. Unfortunately, the NOP does not signal that DWR intends to do this, as it includes no real alternatives whatsoever. The NOP declares, The scoping process will inform preliminary locations, corridors, capacities and operations of new conveyance facilities to be evaluated in the EIR. In identifying the possible EIR alternatives to be analyzed in detail, DWR is currently considering alternatives with capacities that range from 3,000 to 7,500 cfs, with varying degrees of involvement of the CVP, including no involvement (NOP 9.). These are not "alternatives." They are simply the same Tunnel Project dressed up in different outfits. The Draft EIR must include real alternatives, specifically a "no tunnel" alternative, that analyzes the state's use of and investment in local programs and projects relating to water conservation and efficiency measures, along with others, that achieve the same water reliability goals as the proposed project and increase freshwater flows through the Delta by reducing exports. Such alternatives would keep the freshwater flowing through the Sacramento River and the Delta instead of diverting significant flows into an underground Tunnel for export.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The Draft EIR Must Include the CEQA-Required Range of Reasonable Alternatives An EIR must "describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." CEQA Guidelines § 15126.6(a). "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." § 15126.6(b). However, there is no indication that DWR intends to comply with the law stated above. The NOP does not mention alternatives that would reduce reliance on the Delta as required by the Delta Reform Act, nor does the NOP address Delta Reform Act-required "through-Delta" as opposed to "dual conveyance" alternatives. There are no mentions of alternatives that would increase freshwater flows through the Delta and protect California's rivers by reducing exports. And the NOP does not state an intention to give a "hard look" at trade-offs between maintaining or increasing exports by way of the Tunnel Project as opposed to reducing exports to protect the Delta and California's rivers.
745	Sierra Club of California, AquAlliance, California Water	But when government agencies refuse to meaningfully consider less environmentally harmful alternatives due to policy reasons, and offer no explanation as to why they are refusing to do so, courts have regularly

	Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	invalidated certification of environmental review documents. In Pacific Coast Federation of Fishermen's Assn's v. U.S. Dept. of the Interior, the U.S. Court of Appeals for the Ninth Circuit reversed a district court decision denying environmental plaintiffs' summary judgment because the challenged environmental document issued by the Bureau of Reclamation under NEPA (National Environmental Policy Act), "did not give full and meaningful consideration to the alternative of a reduction in maximum water quantities." (655 Fed.Appx. 595, 2016 WL 3974183*3 (9th. Cir., No. 14-15514, July 25, 2016) (Not selected for publication).) "Reclamation's decision not to give full and meaningful consideration to the alternative of a reduction in maximum interim contract water quantities was an abuse of discretion and the agency did not adequately explain why it eliminated this alternative from detailed study." (Id. at *2.) The Court noted that Reclamation's "reasoning in large part reflects a policy decision to promote the economic security of agricultural users, rather than an explanation of why reducing maximum contract quantities was so infeasible as to preclude study of its environmental impacts." (Id. at *3.) The requirement under NEPA, also true under CEQA, to consider the alternative of reducing exports to increase flows through the Delta is so obvious that the Ninth Circuit's decision was not selected for publication because no new legal analysis was required to reach the decision. The decision pertained to interim two-year contract renewals. If the alternative of reducing exports must be considered during renewal of two-year interim contracts, it most assuredly must be considered in the Draft EIR for the Project. So, alternatives reducing exports must be considered pursuant to CEQA and under the mandates of the Delta Reform Act., which, again, requires the State of California "to reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency." (Water Code § 85021.) DWR must comply with CEQA by developing and including real alternatives including "through-Delta/no Tunnel" alternatives in the Draft EIR.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (B) A reasonable range of Delta conveyance alternatives, including through- Delta, dual conveyance, and isolated conveyance alternatives and including further capacity and design options of a lined canal, an unlined canal, and pipelines.
746	Friends of Stone Lakes National Wildlife Refuge	The project alternatives must be expanded to include alternative means of achieving project objectives. Given the huge scope and considerable environmental impacts of the Delta Conveyance Project, the need to seriously evaluate alternatives that would accomplish most, if not all, of the tunnel proponents' objectives, remains imperative. Governor Newsom's call for development of a Water Resiliency Portfolio was a hopeful step in that direction. Unfortunately, the resulting, hastily prepared document fell well short of expectations, and the tunnel project remains as one on a list of several projects and programs.

746	Friends of Stone Lakes National Wildlife Refuge	We urge the Project proponents and the Department of Water Resources to provide a balanced analysis of alternative strategies and projects put forward in recent years. These would include, but not necessarily be limited to 1) the Sierra Club's Sensible Water Management Portfolio Smart Tunnel Alternative, particularly the strategies to increase irrigation efficiency and reduce San Joaquin Valley ag water demand; 2) John Garamendi's Little Sip, Big Gulp Alternative utilizing the Sacramento Deep Water Ship Channel and a shorter, pressurized pipeline to Franks Tract; 3) Robert Pyke's Western Delta Intake Concept; and 4) brackish water treatment in the south Delta prior to delivery to points south.
746	Friends of Stone Lakes National Wildlife Refuge	Alternatives to infrastructure components of the Delta Conveyance Project must be evaluated. The scope of the project is of such huge magnitude that individual tunnel intakes, the forebay, the tunnel alignment, the tunnel construction launching sites, the southern terminus infrastructure and the electrical transmission lines—all have alternatives with varying degree of environmental impact. The alternative sites for and design of these components should be informed not just by engineering and cost considerations, but by their relative environmental impacts. The analysis of alternatives in the EIR should reflect this, particularly with respect to intake alternatives and alternative tunnel construction launching sites
746	Friends of Stone Lakes National Wildlife Refuge	Site and Design Alternatives to the Tunnel Intakes Must Be Evaluated. Information disclosed during the DCA Stakeholder Meetings reveals that the intake locations were solely determined by engineering considerations. In particular, no consideration has been given to terrestrial impacts in conjunction with the placement of fish intakes. The environmental analysis needs to evaluate location and design alternatives that take into account both terrestrial and aquatic impacts as opposed to optimizing engineering considerations. For example, the current project design places all intake infrastructure immediately behind a levee surfaced on both sides with concrete. Setting the road, intake support structures and settling ponds back from the levee would allow retaining and/or reestablishing the riparian corridor.
746	Friends of Stone Lakes National Wildlife Refuge	Site alternatives to the tunnel construction launches must be evaluated. Discussion at the DCA Stakeholder Meetings reveals that ongoing analysis is underway to determine where tunnel boring stations will be placed along the alignment. The environmental analysis needs to consider alternatives that fully take into account the terrestrial species impacts of these alternatives. See the attachment on criteria and methodology for conducting this analysis.
747	Jan McCleery Save the California Delta Alliance	My feedback strongly backs up the ITRC's feedback (and the Independent engineering board's feedback to DWR in 2010) that the Central Corridor is no place for this construction project.
747	Jan McCleery Save the California Delta Alliance	In addition, the NOP Eastern Corridor is not as far east as the WaterFix eastern route so is still on Delta Islands and goes through wetlands - both are issues.
747	Jan McCleery Save the California Delta Alliance	Any of the routes (Central Corridor, Eastern Corridor or the ITRC's far Eastern I-5 Route) doesn't address the significant damage the intake locations will do to the legacy communities in the North. (That impact is detailed in testimonies presented to the SWRCB's Permit Hearings and the DSC's Consistency Hearings).

		And doesn't address the long-term impact of reducing Delta Flows through the Delta, which will ruin the estuary.
747	Jan McCleery Save the California Delta Alliance	Two other alternatives need to be considered for the NOP EIR: The Far Eastern I-5 Route recommended by technology experts in 2010 and again this year, and the "No Tunnel" alternative (in conjunction with Governor Newsom's Portfolio projects).
747	Jan McCleery Save the California Delta Alliance	The current intake locations were rejected by the DSC Staff and were about to be rejected by a Judge subsequently. Other intake locations and configurations must be reasonably evaluated. Having an existing water right is not the legal criteria for evaluating intake locations.
747	Jan McCleery Save the California Delta Alliance	Step one needs to be to find a new intake location and start applying for a new water right in a more acceptable location.
747	Jan McCleery Save the California Delta Alliance	For the EIR, four alternatives deserve consideration: 1. Central Corridor 2. Eastern Corridor 3. Far Eastern I-5 Route 4. No Tunnel
747	Jan McCleery Save the California Delta Alliance	A "No Tunnel" alternative should not be the alternative that was in the BDCP/WaterFix EIR, a do nothing alternative. It should be analyzed as combined with Governor Newsom's portfolio approach, to reduce reliance on the Delta and to provide alternative sources of water.
747	Jan McCleery Save the California Delta Alliance	ITR's I-5 Far Eastern Route In February 2010, the Independent Technical Review Panel for the twin tunnels project made the same recommendation, because further east would "yield better conditions both for constructing tunnel shafts (portals) and for boring the tunnels." Obviously, DWR has chosen to ignore those recommendations, but a real analysis is warranted. First, the State already owns land on both sides of I-5 with future plans to widen that road. Adding construction lanes and intersections would cause no additional traffic impacts and has the advantage the separate lanes could be used after the construction period as separate carpool lanes, per the State's long-term plan. Emergency services can be better provided for this far eastern route. It seems to me that the impact of air pollution or noise would be insignificant for a corridor where there already is a six-lane freeway. The project could leverage the Port of Stockton. Tunnel segments could easily be delivered there. That route would significantly reduce the impact of traffic on Highway 4, hence that roadway may not need to be upgraded (depending on traffic to/from the Southern Forebay.) In addition, new replacement bridges may not be needed. I have heard that there is an impact on Stockton's environmental justice and disadvantaged communities with that route. Wetland impacts would be lower. Muck ponds – Nearness to I-5 supports hauling the muck to a more appropriate location. No boating issues.
747	Jan McCleery Save the California Delta Alliance	No Tunnel - This is the best alternative; the only acceptable choice.

748	Santa Clara Valley Water District (SCVWD)	Because Valley Water receives supplies from both the SWP and CVP, we request that DWR evaluate the full range of conveyance alternatives that meet the Proposed Project objectives, including cost-effective tunnel sizes and operations up to a 7,500 cfs capacity, single-tunnel alternative and full involvement of the CVP.
749	Augostina Duncan	DWR must remove any shaft or tunnel route in proximity of residential developments, in particular the proposed shaft near Discovery Bay and Byron in Contra Costa County. Alternative routes must be considered to avoid potentially very harmful impacts to communities in and near the Delta.
750	David Guy Northern California Water Association	Sacramento River Basin water resources managers encourage the Administration and project proponents to collaborate with them on a solution for modern Delta conveyance that does not redirect impacts (water supply, environmental and financial) to the Sacramento River Basin, thus avoiding impacts to the region's special mosaic of farms, cities and rural communities, fish, birds, and recreation. To achieve these objectives, it will be essential to demonstrate how the Central Valley Project and State Water Project can be operated to support modern Delta conveyance, the co-equal goals, and protecting the Delta as a place--while continuing to serve multiple beneficial uses in the Sacramento River Basin and promote regional water sustainability for all of these beneficial purposes.
751	Mary Ann Robinson	The Environmental Impact Report for this project should definitely include a "no tunnels" alternative.
752	Amber McDowell Double M Farms	There are numerous alternatives that can provide new water resources, not impact the Delta, and are cost effective that the state continues to overlook. I ask that the state to face the reality that this project is horrible and start looking at all of the local and regional water projects that will make a huge impact in California's water sustainability and security with minor impacts to communities and the environment.
752	Amber McDowell Double M Farms	Requests the EIR address the following projects instead of the proposed tunnel: Dredging rivers, Sites Reservoir, Desalination, Recharge, and supporting legislation to allow groundwater storage to be considered a beneficial use.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The Delta Conveyance Project extends the operational lifespan of the SWP Facilities by adapting the project to be viable beyond the date in which the current facilities would become unviable under assumed No Project future sea level rise conditions. The No Project Assumption for the Delta Conveyance includes a 1 O' increase in sea level. This sea level rise would effectively end the viability of the current (No Project) SWP water supply before or around approximately the year 2050. Therefore, the Delta Conveyance Project EIR impact analysis must include as part of their direct, indirect and cumulative impacts, the on-going impacts of continuing to operate the SWP beyond the time period in which it would have been viable without the project (the No Project). the sea level rise that is assumed under the No Project condition for the Delta Conveyance Project means the SWP will not be viable at a certain date in the No Project condition. Therefore any ongoing and incremental impacts of operations of the project beyond that date of No Project SWP viability are all impacts of the Delta Conveyance Project that must be disclosed, analyzed and mitigated in the EIR. These on-going incremental impacts include, but are not limited to: soil salt accumulation, land use changes, genetic introgression of fisheries biologically distinct units, population growth inducement, etc.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Alternative solutions which do not include the very expensive and greatly damaging tunnel or other isolated Delta conveyance facilities should be objectively analyzed.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The analysis provided in these comments on the Executive Order and the NOP Project Objectives provide a series of alternatives development screening criteria. A cumulative scoring assessment of the alternatives and the Proposed Project is set forth in Table 1. Comparison of Proposed Project Alternative to NOP Objectives and EO N-10-19 Water Resiliency Portfolio Mandates. The Proposed Project only satisfies 2 of the 21 screening criteria. The identified combined set of project alternatives meets 20 of the 21 screening criteria.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Alternatives, paragraph 2, "DWR will make its final choice of potentially feasible alternatives to include in the Draft EIR after receipt of scoping comments." DWR must consider and evaluate the alternatives identified in the scoping comments, not just make a final decision after receiving them. This DWR statement is a declaration of the intent to ignore the input from the alternatives scoping process. A Scoping Report that discloses the alternatives assessment methods and rationale and the final selection process must be issued for public disclosure and comment.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The agencies strongly support the improvement of the Delta levee systems and the continuation of the through Delta conveyance of water for export which maintains the "Delta common pool" for both export and in Delta use and the common interest in maintenance of Delta water supply and quality as required by Water Code Sections 12200-12205.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	A more comprehensive assessment of risks to SWP water supply reliability must address risks throughout the SWP system. If any link in the chain of SWP facilities is broken, from water origin to water destination, the whole system fails. Therefore the whole of the system must be included in the scope of the project to address water supply reliability. A number of SWP system risks present a higher risk of failure than the current through Delta SWP water conveyance. Consideration of a multilayered strategy to dramatically reduce through Delta SWP water conveyance risks that works with the natural Delta features and creates and enhances habitat values and water quality should be included within the project scoping.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The Proposed Project does not reduce flood risks and does nothing to protect the Delta from sea level rise. The project must evaluate alternatives in which the Delta is not abandoned by the State to an assumed future sea level rise.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Comment includes a table of Alternatives prepared (including 16 different alternatives and alternative components) that shows that each of the project alternative components more fully meets the NOP project objectives and EO Water Resilience Portfolio Mandates more completely than the Proposed Project.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Reconnect Delta Distributary Channels This is an important project alternative component that has significant synergisms with other project alternative components. This alternative has never been evaluated in modeling or in an environmental analysis. It has merits and functions never considered before as a method to address Delta flow, habitat, water quality issues and SWP water supply reliability and resiliency. Reconnecting northern delta distributary channels will allow better water quality from the Sacramento River to push and be drawn across the West, Central and East parts of the delta to the south and much more efficiently freshen water quality than the current and unnatural choked delta channel flow configuration. This means that likely less carriage water would be required to maintain water quality in large parts of the delta. The flows in these distributaries would function for habitat, water quality, carriage water and as water supply deliveries for the south delta SWP pumps. The reconnected head ends of these tributaries would need to be fish screened and have operable gates (like the Delta Cross Channel). These are projects with lower cost and much smaller footprint than the Proposed Project intake screens. Operable gates would be required to avoid redirected flood flows which the USAGE would not allow in 404 permitting. The benefit of the operable gates of course is reduced flood risk as compared to the existing condition or the Proposed Project so that is a clear win for the Delta and a satisfaction of this criteria from the Water Resiliency Portfolio mandate. The fish screen would keep the Sacramento system fish in the main channel for reduced straying and increased juvenile emigration survival. The flows are small so approach, sweeping velocity and duration of fish exposure criteria for fish screen compliance would easily be met. These reconnected tributary flows contribute to SWP water supply reliability in that in the event of a levee failure, the salt water intrusion into the delta could be purged from the Delta more quickly and efficiently by controlling where and how much cross flow occurs to flush the saline water out. The flows through these currently dead end sloughs create substantial new and productive fish habitat and fish food generation. The habitat improvement benefits of these reconnections and activated habitat could provide justification for issuance of the ITPs the project would need and provide a basis for credit to offset other potential project impacts from the small, but required construction footprints. The habitat improvement and fish food generation make this project alternative component a clear win for Delta fish, habitat and water quality. It performs this function at the same time as increasing water supply reliability by providing a dynamic mechanism to control flows across sections of the delta that currently have little to no flows during large parts of the year. Following are descriptions of the Distributary channel reconnection opportunities. Not all of these need to be selected in order for this alternative component to valuably contribute to the function of the project alternative (see comment letter for details on each component): Fremont Weir to Tule Ditch in the Yolo Bypass Sacramento Deep Water Channel Railroad Cut Snodgrass Slough Elk Slough Delta Cross Channel Georgiana Slough
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: South and West Delta Distributed Intakes The current SWP through delta configuration pulls all of the water for the SWP from Clifton Court Forebay which is from Old River. This creates reverse flows on Old River which pull fish into the unscreened intake to Clifton Court. This alternative component proposes to add intakes in the south and west delta so that SWP intake flows can reduce the impact on fish and add capacity and flexibility for diversion during high flow periods. These connections could be fish screened or not. The supplemental flow source configuration would allow flexible SWP operation to avoid

		ESA fish populations when present at different locations and avoid water quality violations while still maintaining some intake flows. Intakes at multiple locations make the SWP less vulnerable to water quality issues in the event of a delta levee breach. An intake at the south end of Victoria Canal could provide screened flow into Clifton Court while allowing Old River flow to move downstream past a closed Clifton Court gate. Contra Costa Water District has a screened intake on Victoria Canal, a screened intake on Old River downstream of Clifton Court, an intake on Rock Slough, East contra Costa Water District Has an intake off of Indian Slough and there is an intake at Mallard Slough. Interconnection of these intakes with the Contra Costa Canal and pipelines and a connection to Clifton Court and or the enlarged Los Vaqueros Reservoir could address the export need without the expenditure of 10s of billions of dollars . A number of locations and combinations are feasible and should be evaluated. The capacity of these distributed intakes could be limited in size in the range of a few hundred cfs and easily screened. The distributed intakes could improve water quality in areas of the delta with chronic water quality problems that currently impair designated critical fish habitat for several listed species. The distributed intakes also increase water supply reliability for the SWP in the event of an island flooding event. It also provides operational flexibility to avoid water quality violations and impacts to endangered fish from SWP operations
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Delta Water Diversion Intake lnterties Throughout the SWP, interties with other water systems have been considered a good strategy to reduce failure risks and mutually improve water supply reliability. This project alternative component as described above proposes to connect a number of south and west Delta municipal water intakes together with the SWP. This intake intertie creates more water supply reliability for the SWP and for the non-SWP water users from the Delta.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Carquinez Straight Tidal Flow and Storm Surge Management This alternative component was originally proposed in the 1920s and examined again in a 1977 UC Davis California Water Resource Center paper, "The Sacramento-San Joaquin Delta The Evolution and Implementation of Water Policy'', by W Turrentine Jackson and Alan M Patterson. Their assessment of a Carquinez Straight Flow Control structure was very positive and can be found starting at page 63 in such document. Without describing the facility in detail, think of this alternative component as an operable flow constrictor at the Carquinez Straight. Ships and fish pass without impediment, but peak tide or storm surge events are moderated in their ability to push salt water and water volume into the delta. As they say, "you can't hold back the ocean forever'', but in this case, the objective of this alternative component is only to temporarily reduce peak tides and storm surges. Peak tides and storm surges compound the affects of sea level rise on flood risks, water quality problems and water supply reliability in the Delta. By this proposed facility taking the peaks off of storm and tidal surges it effectively reduces the combined effect of sea level rise that would otherwise occur and that the Proposed Project completely fails to address. There are many potential design options for this facility - that is a set of engineering questions to resolve in preliminary (less than 5%) design that can be completed if this alternative concept is determined to have merit for development into a full alternative component. This alternative component is very important to evaluate as it is the only option identified so far which directly addresses and partially mitigates the impacts of sea level rise on the delta and on SWP water supply reliability. The location of the Proposed Project north delta intakes will not protect the SWP water supply water quality or reliability from the magnitude of sea level rise the project

		has assumed. We know this because the old salinity water monitoring station on Randall Island is less than a mile from one of the Proposed Project intake locations. The salinity monitoring station was there because under historical flows, salt water quality problems could manifest themselves this far upstream in the Sacramento River in this intertidal zone. Modeling results of the north delta intakes under future sea level rise conditions will validate the failure of the proposed north delta intake locations to protect against sea level rise impacts on SWP water supply reliability and system resiliency. Given this reality, the Proposed Project fails to address or satisfy the screening criteria for improved water supply reliability under increased future sea levels. A Carquinez Straight Flow Control Structure would reduce salt water intrusion into the delta which improves Delta water quality which in turn protects SWP water supplies and increases SWP resiliency. Reduced saltwater intrusion into the delta will likely result in reduced carriage water requirements to maintain water quality so water supply efficiency may also be enhanced in this alternative component.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Water Storage Project Alternative Components Increased water storage allows increase in flexibility and response of the SWP to water quality problems and increased carriage water efficiency. See details in comment letter for each of the following components: Sacramento Deep Water Ship Channel as in-Delta Water Storage; San Luis II or San Luis Grande.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Increased Levee Monitoring and Fast Response Resources for Levee Breaches This alternative component is aimed at reducing flood risk and increasing SWP water supply reliability by reducing the risk of or severity of a levee breach. The first objective of this alterative component is to prevent levee failures through better monitoring and maintenance. There are at least 4 monitoring and assessment tools which are underutilized and not methodically implemented which can provide information to substantially reduce the risk of levee failure. LIDAR and thermal remote sensing surveys of the delta levees should be conducted annually. LIDAR maps land surface elevations to an accuracy of just a centimeter at every square foot of surface so any changes in levee height due to subsidence or levee shape deformation from slumping or toe failure would be detected and remediated long before these early warning signs developed into levee failure events. Thermal imaging detects surface temperatures. Detectable changes in temperature are caused by water saturation and moving water, even below the soil surface. This technology provides detection of seeps and boils at early stages so these risks to levee integrity can also be proactively addressed prior to levee failure. Side scan sonar surveys of the underwater parts of the levee can be used to detect and map levee toe failures and channel scour holes that could lead to levee failure if unaddressed. These levee integrity threats detected by the side scan sonar can again be proactively addressed long before an actual levee failure occurs. Ground penetrating radar can be used to inventory and assess levee construction integrity. Voids, saturations and flaws in materials used in original levee construction can be detected and mapped with this technology. Identified sections of weak or poorly constructed levees identified with ground penetrating radar can be replaced (i.e. set back levees) or repaired (i.e. slurry walls) prior to failure. Methodical use of these technologies to early detect potential problems with levees that could lead to levee failure and proactive use of that information to address these vulnerabilities will greatly reduce the risks of levee failures to flood impacts and SWP water supply

		reliability. The Delta Conveyance Project should not fall to claim these monitoring programs are already occurring, because they are not at the scale and frequency proposed here. The one or two LIDAR surveys of the Delta that have been conducted are useful as baselines to start comparisons to detect problems but this tool is not being utilized to its full potential with regular and regimented monitoring. Similarly, ground penetrating radar has been used in some levee assessments, but it has not been applied to all delta levees nor have the current surveys been comprehensive, methodical or repeated as a monitoring tool. The same can be said of the level of use of thermal imaging and side scan sonar survey technologies. The second objective of this alternative component is to change how levee breaches are addressed. Currently, once a levee is breached the island or tract is allowed to completely flood, come to equilibrium with the tributary and later the levee breach is repaired and the inundated land pumped out. In the current "sit back and watch until it stops" response to levee failures, all of the damage from the levee breach is done before repair or management actions are implemented. This results in the maximum salt water intrusion as all of the flow into the beached island or tract happens very quickly. All of the infrastructure and assets on the island or tract are flooded. Potentially lives are lost. This alternative component is intended to provide resources and level of response preparation that allow a levee breach to be more immediately addressed to slow or stop the rate of water inundation. This alternative component is not expensive to implement compared to the cost of a levee failure that results in complete inundation. This alternative component includes: larger and more strategically placed rock stockpiles in helicopter and crane ready packages, dedicated heavy lift helicopters on standby with National Guard or contractor, crane barges on standby and strategically distributed in the delta for rapid response, and sinkable barges strategically distributed in the delta for rapid response. Scenarios and analysis should be conducted to determine the number and locations of these resources to be effective to respond to any hypothetical levee breach in 30 minutes or less. The objective is to stage these resources to seal or at least significantly slow levee breaches while more permanent fixes are constructed, etc. This alternative component results in increased water supply reliability for SWP by reducing frequency and severity of island flooding events and the reducing the frequency and magnitude of potential salt water intrusion events.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: SWP Conveyance South of Delta Achieves Less than 3% System-Wide Leakage Loss The California Aqueduct leaks perhaps as much or more than 15% of the water supply that flows through it. We are not aware of any published audited water loss analysis of the SWP or California Aqueduct. Water diverted into the SWP lost to conveyance leakage is water that causes environmental impacts to the delta that could be avoided and minimized by reducing SWP conveyance leakage losses. DWR promotes water conservation across the state in many programs, but has not (to our knowledge) disclosed what water savings they in turn have achieved from SWP leakage loss mitigation. DWR's Leak Loss Detection Guidebook, "The California Department of Water Resources estimates that about 250,000 acre-feet of water leaks from municipal systems in California each year. DWR's experience in working with 60 local water agencies, whose water audits reveal leak detection projects to be cost effective, indicates that leaking water can be controlled at a cost averaging less than $50 per acre-foot, a cost usually less than what a water agency pays for the water." (https://water.ca.gov/LegacyFiles/wateruseefficiency/publications/doc/%201992%20DWR%20Leak%2

		OD etection%20Guidebook.pdf) There are leak loss reports on SWP Contractor conveyance systems at http://wuedata.water.ca.gov/. Finding and quantifying the conveyance losses in each reach of the California Aqueduct is technically feasible using well proven and affordable technology. Acoustic Doppler current profilers (https://en.wikipedia.org/wiki/Acoustic Doppler current profiler) can be calibrated and periodically measure flows in the aqueduct at stations upstream and downstream of each diversion. Evaporative losses for each reach can easily be calculated using existing models. Reaches that exceed the target leakage loss tolerance can be prioritized for more intensive investigation to identify the leak locations and efforts initiated to recapture those conveyance water losses. An example of the California Aqueduct leakage is demonstrated by a thermal image of a section of the aqueduct at mile point 9.9 south of the South Delta pumps (image available upon request although DWR should have a copy of the report and this image in its project archives). The only section of the canal in the image that is not leaking is the section at the lower left. The canal (in blue - cool temperatures) in most areas in the image transitions to larger areas of oranges and reds which identify the location, size and orientation of the leaks. The image is from a project for DWR in 1990. DWR believed the surveyed area to have 3 leaks. The survey identified those three large leaks as well as over 200 smaller ones. The current available technology to detect, locate and characterize aqueduct leaks is now vastly superior to this example. Long-term leaks of the aqueduct carry soil away with the leak flow. These create voids under the aqueduct which are prone to catastrophic failure. Reduced leakage loss of the SWP aqueduct not only improves water supply efficiency and reduces environmental impacts of water supplies diverted in the Delta, but repair of leaks likely prevents potential catastrophic aqueduct structural failures which threaten SWP operational reliability. This alternative component reduces SWP water diversion environmental impacts on the delta and reduces risks to water supply reliability failures.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Seismic Risk Mitigation in SWP Storage and Conveyance There are many parts of the SWP system potentially vulnerable to seismic failure, not just the Delta component of SWP conveyance as the Proposed Project targets. This project alternative component is much more comprehensive in its scope to address SWP water supply reliability and resilience from potential seismic or structural failure events. See comment letter for details on each of the alternative components: Seismic Upgrade of Banks Pumping Plant and California Aqueduct Oroville Reservoir Slip Fault Oroville Dam "Green spot" Leak
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Clifton Court Criteria Compliant Fish Screens The Proposed Project does not address ESA fish take from south delta pumps or offer any feature or function which benefits fish species or habitat as mandated by the Water Resiliency Portfolio Executive Order. The Proposed Project fails to address necessary environmental and ESA impacts created by operations of the SWP. It is these impacts which are one of the greatest threats to SWP water supply reliability and the Proposed Project missed it entirely in its scope and proposal. Recall in the BDCP WaterFix EIR/Ss that the north delta intakes were determined not to be beneficial to protection of fish even as compared to the existing unscreened (louvers are not screens) south delta intakes. It is technically feasible and reasonable to include fish criteria compliant intake screens at Clifton Court Forebay. Fish criteria compliance intake screens in this alternative component would potentially support justification for Incidental Take Permits that would be required for the Delta Conveyance Project. Here are the basic elements to this Clifton Court criteria compliant fish screen project

		alternative component: widen the Clifton Court operable gates, install trash racks outside the operable gates, install a course large fish exclusion screen between the trash racks and operable gates, construct a conveyance channel in Clifton Court Forebay from the operable gates to the western side of Clifton Court Forebay, install criteria compliant fish screens in the conveyance channel, reengineer the current fish salvage facilities, and (potentially) plumb the CVP intake into the fish free north side of Clifton Court via a short tunnel. See comment for a more detailed description of each of these elements.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Desalination at SWP Contractor Point of Delivery As a part of SWP operations resiliency and water quality suitability for designated beneficial uses, a component of alternatives to be considered should include water treatment at the point of delivery to SWP contractors. This option allows users to ,balance their own water quality to beneficial uses and costs of water treatment for SWP water supplies. The on-site water treatment means they can improve not only SWP water supply quality, but also alternative and supplemental water supplies they are legally mandated to develop to reduce their reliance upon delta water supplies. This option also allows for water quality degradation that occurs due to evaporation during conveyance and downstream of delta storage to be rectified at the point of receipt by the water contractors. These could be either as part of a combined project alternative or as separate projects under the Water Resiliency Portfolio.
754	William L. Martin	The Draft EIR Must Include the CEQA-Required Range of Reasonable Alternatives. An EIR must "describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." CEQA Guidelines § 15126.6(a). The NOP as drafted fails to consider any alternatives except the proposed tunnel project. There are no mentions of alternatives that would increase freshwater flows through the Delta and protect California's rivers by reducing exports. And the NOP does not state an intention to give a "hard look" at trade-offs between maintaining or increasing exports by way of the Tunnel Project as opposed to reducing exports to protect the Delta and California's rivers.
755	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	The full array of all viable alternatives will need to be evaluated and compared with the negative impacts – environmental and economic – borne by the Delta Region from all phases of this tunnel plan. Typically Alternatives have, to one degree or another, been superficially looked at, and 'spun,' to give an apparent advantage to the Lead Plan. Here are two Viable Alternatives that require detailed study: One: State of the art desalination plants in Southern California. (Some scenarios could even involve utilization of the Salton Sea) Good news: In the coming decades, as Northern California fresh water becomes more scarce, more unpredictable, and generally problematic, sea water will become ever more plentiful – and diluted. One question that will need to be answered is: For an initial expenditure comparable to the $14billion to $20billion cost for a Delta tunnel conveyance, what do you get short term, but especially long term, in desalination derived fresh water? Two: In conjunction with implementing non-depletion alternatives, a "conveyance system" including natural drainage augmentations specifically designed to bring MORE fresh water into the Delta.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	Assuming, on the other hand, that it is DWR's plan to use the project to abandon the maintenance of adequate Delta water quality in the wake of sea level rise: (f) Importantly, the potential environmental impacts from this planned abandonment of maintaining adequate Delta water quality must also be thoroughly compared and contrasted with alternatives, including the no project alternative, that comply with all applicable laws and policies and, accordingly, do not involve DWR's abandonment of such maintenance.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR, accordingly, must include a reasonable range of non-tunnel alternatives that actual meet the co-equal goals in a manner that truly protects and enhances the Delta's values and truly reduces reliance on the Delta. The CDWA has suggested various non-tunnel alternatives in its other scoping comments incorporated and referenced herein.
767	Kelley Taber City of Stockton	CEQA requires that DWR consider alternatives to the Project capable of avoiding or substantially lessening its significant impacts. Given the potential for significant impacts to the quality and reliability of water supply for Delta water users, and significant health impacts to Stockton's citizens (as well as Delta Reform Act mandates), the EIR should fully evaluate an alternative that does not include a north-Delta diversion or tunnel. Such an alternative, or alternatives, should include water reclamation, localized desalination and increased capture, storage, and conjunctive use of localized rainfall in lieu of continued or increased Delta exports. The EIR also should evaluate an alternative that would include Delta levee rehabilitation and place the intakes in the western Delta (see, e.g., Exhibit A and https://www.sacbee.com/opinion/op-ed/soapbox/article21015513.html.) Finally, the EIR should evaluate an alternative that avoids Delta water quality degradation by limiting any Sacramento River diversions to periods of extreme high flows.
772	Joseph Rizzi	Mr. Rizzi has attached two documents highlighting CA's water problem. One, Salt water intrusion into the Delta area is best restricted in San Pablo Bay and at Benicia Bridges. Two, Clifton Court Forebay needs a 1.5 mile fish screen to keep all fish in Delta and out of Forebay. Proposes the 1.5 mile fish screen with variable (inflatable gate/barrier) allows for normal flow during day and filling CCF at night.
774	Don Hankins California Indian Water Commission	Project alternatives should include opportunities beyond conveyance. These opportunities include reducing demand on water by all users. Key opportunities exist for land retirement, restoration of historic wetlands and reservoirs for natural storage, infiltration, and ecological benefits, which all work to reduce water demands unsustainable water uses and achieve species recovery. Other opportunities include modifications to the antiquated aqueduct system, which utilizes open canals for conveyance, but could be placed into pipes to reduce loss and vulnerability. Further, these pipes could be turned into a source of energy via inline power generation and other similar technologies. Alternatives should also look beyond the existing state and federal water projects for sources of water.
778	Jacklyn Shaw	We don't understand the Delta Map Plans, and true Delta Heritage Act. The Delta "Conveyance" plan includes near Terminous with recreational marinas and agri-tourism. Near Terminous is no options but a threat to the environment, and liabilities. If any "funnel" 60 foot wide for 300-500 miles away for Delta water exports, a better option is Delta West Side. Delta East Side has Delta breeze, 20-90 mph, stressing the environmental concerns and liberties. Why ignore the elected Supervisors Coalition of Five Delta Counties

		who say that any tunnel would be damaging to the Delta, with 2/3 of San Joaquin County and 100 varieties of fresh food crops.
779	Carol Kennedy and Bobby Ferreira	Aren't there some underground water storage areas south of us? Why does the water have to come from the Sacramento River? Can't the brains of this water push find another source that will not disturb the lives of millions of people?
781	Janet Wall Wintu Audubon Society	The EIR should analyze the ways that a "no tunnel" alternative or alternatives could increase Delta outflow. The EIR should address methods to enhance water supply reliability which do not involve construction of a tunnel. The EIR should address methods to increase efficiency of delivery which do not involve construction of a tunnel.
783	Mark Miyoshi Winnemem Wintu Tribe	Neither No Action and No Tunnel Alternatives are mentioned in the NOP. DWR appears to believe that the purposes and objectives of the Project cannot be accomplished by any other means other than a tunnel that will have vast and irreversible consequences. The need for water South of Delta can and should be reduced by only permitting the planting of food crops to be sold domestically rather than allowing high water demand export crops; developing and implementing water conservation measures and water conserving urban development models; repair and re-design leaking and inefficient water delivery systems; etc. Water saving models and technology are readily available, less expensive than this mega-dollar Project and would protect the natural systems that all in the State ultimately depends on for food and water.
783	Mark Miyoshi Winnemem Wintu Tribe	The Project Objectives are clearly only short term band aids for problems that people and our economy have created. The several billions of dollars cost of the Project could go a long way to addressing climate change and resultant sea level rise. Locally and sustainably sourced water delivered by efficient distribution systems designed for environmentally appropriate urban and commercial development would be more cost effective and less dependent on the fragile Delta levee system. Green infrastructure water storage has been ignored but would increase reliability of water systems if incorporated in a non-exploitive way. Improvement of Delta aquatic conditions can only be accomplished with wholistic planning and wholistic project implementation. This EIR must study the long term ecology, economics and ultimate applicability of both the Project and sustainable alternatives that would produce less environmental damage and chaos at lower cost outside the centralized, commoditized, corporatized paradigm of the SWP and the CVP.
785	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	Please add the important information in the article below to the environmental review, to discern contributing factors, and cumulative effects, bearing on the spectrum of project's negative impacts - unmitigated, and mitigated, as well as, influence on possible Alternatives. Article: "Historic 'megadrought' underway in California, American West, new study finds," by Paul Rogers, Bay Area News Group, 4/16/20. "The American West, including California, is in the middle of a historic "megadrought" — an ongoing stretch of extended arid conditions not seen in centuries. But the longer trend underway over the past 20 years shows that California needs to accelerate reforms that came out of that drought, said Felicia Marcus, former chairwoman of the State Water Resources Control board. Those include building more off-stream reservoirs to capture water in wet years, expanding conservation programs like paying people to replace lawns with water-efficient landscaping, recycling more wastewater for irrigation and other uses, capturing

		storm water, and other solutions, she said. Because even when it seems like a drought may be over, it will return, she said."
786	Joseph Rizzi	Suggests alternative changes to Clifton Court Forebay, including attachments. This proposal is summarized with: Delta and Environment – Replacing Clifton Court Forebay's 1.5 mile levee with fish screen to end killing of all aquatic life (including endangered species). Delta Flows – Fill CCF only at night when most fish are sleeping, which makes daytime all natural flows. Pumps can operate 24/7 with CCF holding 1 – 3 day supply. CCF capacity can be increased if dredged. Salt – keep a section free of obstruction, but add shipping lock and tidally controlled louvers to reduce salt water intrusion into Sacramento Delta.
788	Jill North	If the Metropolitan Water District needs more water due to expansion or, god forbid, Fracking then they could have found a way to store rain water by now. They could build a desalinization plant. They can't be allowed to steal from fellow Californians as our use has to have first come rights.
791	Arabella Merlo	In regards to Alternatives: This project does not provide equal protection under the law. There would clearly be damage to the people and habitat of the Central Valley and the Delta in terms of air quality, increased algae blooms, Water quality, and damage to the health of the people by redistributing water to benefit water contractors. ln fact, the Metropolitan Water District, by funding this DWR work Creates a vested interest, has created a situation where DWR is predetermining the project and working backwards to approve so called feasible mitigation measures. Alternatives must include No Diversion Alternatives, Such as desalination plants and/or water Storage. Areas benefitting must find their own alternatives to increase their water supply in order to maintain the existing fragile water quality in the Delta.
792	Sarah Salisbury	The water that naturally flows out to sea through the delta must continue to do so, otherwise there will be considerable environmental impacts to the creatures and people of the delta, as well as the same at the confluence of fresh and salt water. Should it be truly the case that sea rise will make for greater salinity in inland waterways, surely, at a cost similar to that of a HUGE tunnel, clever modern science and engineering can adjust for that.
793	Rebekah Olstad	The EIR should analyze alternatives that would increase Delta outflow and reduce water exports as compared to current conditions in the Delta. The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful and more economical than the tunnel and achieve the same water supply reliability goals and targets. The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a "no tunnel" alternative and investment in water conservation and efficiency improvements to meet water supply needs. DWR must investigate serious alternatives, including a no tunnel alternative that could address the main objectives of this project without any additional water diversions. Input from tribes, traditional ecological knowledge, and the recommendations in the Environmental Water Caucus' "A Sustainable Water Plan for California," should be considered in developing a No Tunnel alternative.
798	David F. Scatena	I submitted an alternative plan earlier in this process! I pray that it will be given maximum consideration! It contained provisions to provide water by other means than killing the Delta. It would be more economical and noninvasive to farmland that has been farmed for near 100 years. It would also prevent

		salt water intrusion into the Delta killing off farmland in the Delta Region! Reminder: stop the pumps along the aqueducts, build storage areas to capture rai runoff south of the pumps, require drip irrigation, stop planting of tree crops that require lots of water and build desalination plants paid for by Metropolitan Water District & Westlands irrigation District etc. etc.
801	Denise Louie	The project should be tied to a rationalization of water use. Thirsty export crops and green lawns should be limited. Freshwater should be used more than once as greywater. More rooftop rain harvesting should be required. My household averages 14 gal/day/person. We wash hands for 30 sec. using smaller amounts of soap and only a trickle of water. We use environment-friendly soap and laundry detergent for watering plants with greywater. People can and must do better to conserve more freshwater.
803	Jacklyn Shaw	Who is saving the rivers? (It is not by water exports/infrastructure bills, NorCal to SoCal) Delta River, Sierra Rivers, Delta East side, like Terminous recreation area and San Joaquin County with over 100 fresh food crops. If any pipeline (conveyance, tunnel, etc.) put on West side of Delta River... That meets agreements for only when wet. Meanwhile, salt makes more salt, drought cycles make more drought, forewarned to avoid Dust Bowl. Check with Woodbridge/WID vs East Bay EBMUD, in water exports since Pardee Dam, 1929, of Mokelumne (River) Aqueduct towards Port of Oakland. Note: Who plays with the spigots or water bond profits? San Francisco has DESALINATION plants to use every day, and Port of Oakland must do the same. Desal was invented at UCB, with J. Leibovitz, Ph.D., 1977 and since used in 100 nations. California had warranted grants from DOI and Bureau of Reclamation --for Desalination, which costs less than construction, displacing generational agricultural families or small family business. Help please. Check with San Joaquin County Supervisors, sjcgov.org Supervisors of Five Delta counties all have written that any tunnel, water exports, would be devastating (to health, agricultural economy, etc.).
806	Clifford Sanburn	Why not look at desalination projects for the southern part of the state? I am sympathetic to farmers who are willing to invest their own funds in more efficient use of their allotments and alternative, less thirsty crops. I urge you to shelve this ridiculous idea, the latest version of the peripheral canal! The water in the northern part of the state is needed nearer to its point of origin. Look for options closer to home in the southern part of the state and our agriculture can be sustained properly, and the priceless Delta protected.
810	Colin Brodie	After all these years of attending meetings in Sacramento and giving inputs verbally and in writing about how this project would be so detrimental to my life, it seems that has all been forgotten and this project is still being planned through the center of the Delta (the Central Corridor), even though it's clear that is an illogical choice due to lack of infrastructure, impact on boating & recreation, and resulting economic loss due to the shutting down of numerous small recreational and boating-based businesses throughout the Delta.
811	Jerry Willis	The water districts spend over 2 billion dollars on a survey report, that would have bought us a damn that could hold three to four million acre-feet of surface supply water, you can add to our water supply. We need more dams here in California for more surface applied water, well building these dams we could be building hydraulic Electric Power plants which is the cheapest power in the world. If we do Dam the American river that would be 3.5 million acre feet, Dam on the Cosumnes River that's another 3 million acre-feet a surface supplied water if we dam the Mokelumne River that's another three million acre-feet a

		surface supplied water not counting the hydraulic electrical plants that we could build to produce electricity for California. Doing the tunnels is going to run are Delta sanctuary just like Owens Lake and the other lakes that LA and San Diego sucked dry. We need common sense not a bunch of bureaucratic bulshit.
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	Reducing Dependence on Water Imported From the Delta The DEIR must contain an alternative that honors California Water Code Section 85021 that requires all regions of California reduce their dependence on water imported from the Delta. "The policy of the State of California is to reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency. Each region that depends on water from the Delta watershed shall improve its regional self-reliance for water through investment in water use efficiency, water recycling, advanced water technologies, local and regional water supply projects, and improved regional coordination of local and regional water supply efforts."
822	Karen Coffee	Finally, as a resident of Clarksburg, it is unclear to me why you would site an intake pump for the Project at one of the few populated areas along the river. There are miles and miles of sparsely inhabited shoreline available for this purpose. A site decision that prioritizes potential harm to the local population over strict engineering criteria clearly seems to be in the best interest of all concerned.
826	Melinda Terry North Delta Water Agency	When developing alternatives and mitigation measures in the EIR, we encourage DWR to consider how the size, location, and operation of new SWP conveyance facilities can be designed to improve, rather than degrade, water quality in the Delta. The alternative analysis in the EIR should not be limited to tunnel projects with only variations in tunnel and intake sizing, and only east side conveyance alignments. Consistent with existing law in the 2009 Delta Reform Act to "reduce reliance on the Delta in meeting California's future water supply needs" (Water Code Section 85057.5), the EIR should include analysis of alternatives that incorporate actions to reduce the demand for water exports from the Delta, e.g., water use efficiency actions, desalination, and other local self-reliance projects in export areas.
829	Sherri Norris California Indian Environmental Alliance	The Delta Conveyance Project is not the only option to meet California water needs Alternative Solutions that restore environmental functions are better aligned with food security, climate change mitigation and beneficial uses The office of the governor, state agencies and commissions have disseminated statements that support the repeated assumption that the Delta Conveyance project is essential and as such that it must proceed. The current proposed Project is the latest reiteration of a long-standing effort by water purveyors, agricultural interests and state governors to remove water from Northern California rivers to solve the state's need for water. However, there have been no efforts to find out if the Conveyance Project damaging our fragile ecosystem and the fishing industry of California is the only option. We have not received sufficient evidence that this is the only solution that the state should be pursuing. CIEA previously provided this information as part of our expert on the Water Fix Project testimony to the State Water Resources Control Board (SWRCB), in our comments on multiple reiterations of Water Fix EIS/EIR reports, and in more recent comments to the Water

Resiliency Plan, we have repeatedly raised the issue of the lack of effort by the state in fully exploring alternatives. There are alternatives that have not been explored that were previously utilized by California Tribes when Tribes managed the lands and water in California. These solutions would also provide water for California's population, would address climate change and provide support the proper function of the watershed to be restored.

The Delta Conveyance Project points to the Water Resiliency Plan, and further ignores the statewide possibility for surface and groundwater to be enhanced by restoration and enhancement of natural aquatic systems. The Water Resiliency Portfolio states that "use of surface water is limited by how much rain and snow falls each year and how much water can be safely diverted from rivers," but environmentally balanced alternatives have not yet been fully explored. The Plan and the Conveyance Project largely focus on how much water can be stored and diverted instead of focusing on how upland meadows, slowly meandering streams and rivers supported by wide riparian zones, and wetlands could greatly enhance groundwater sequestration and the surface water flows. Where snow would hold back water and release it slowly, upland meadows and non-channelized streams and rivers could offer similar results. Add to this the reintroduction of species such as beaver and other traditionally and culturally important species in strategic areas, this would assist us in naturally slowing water after seasonal rains, providing water in wildlands for fire protections and cooling water for fish habitat. Instead of removing water from the Sacramento River Tribes have a long-sighted goal where local waters are restored to provide clean water, aquatic foods, resiliency from fire ad carbon restoration. Instead we should be exploring alternative sources and technologies to provide urban and agricultural water such as desalination, conservation, water reuse, agricultural shifts that focus on crops that use less water and that use water in a more sustainable way, and to provide water to urban populations. The combination of widely restoring natural systems and instituting innovative water reuse solutions would better provide freshwater and fish for all Californians, and cultural resources for Tribes. Such treatments would naturally recharge our aquifers providing water during dry years, and slow the movement of storm events to protect levies and other infrastructure down river.

The public and the Tribes in the North Sacramento River region do not want to see our river basin fall victim to such an unsustainable vision. Our rivers need water in them. For example, we increasingly see blue-green algae in our waterways and land subsidence due to dewatering and climate change. The best way to protect rivers for human beneficial uses and to support endangered species and food security is to allow rivers and streams to flush during flood events while slowing the water through a wider river system for our use through healthy wetlands. On the coast the best way to protect the Sacramento River from salt-water intrusion and storm events is by restoring and strengthening coastal and bay delta wetlands, aquatic plants like tule and kelp forests.

853	Susan Alexander	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful and more economical than the tunnel and achieve the same water supply reliability goals and targets.
853	Susan Alexander	DWR must investigate serious alternatives, including a no tunnel alternative that could address the main objectives of this project without any additional water diversions. Input from tribes, traditional ecological knowledge, and the recommendations in the Environmental Water Caucus' "A Sustainable Water Plan for California," should be considered in developing a No Tunnel alternative.
857	Anonymous	I just wanted to make a comment as a resident of Northern California where we have fewer voting voices but there needs to be a balance between salinization of the Delta and the normal flow of water from the North State and also farmers and great valleys cannot be hamstrung by the manipulation of water supplies to the farmers. The population of Southern California was sort of built artificial way on water supply that was not really local and perhaps mitigation efforts there could help reduce the amount of water needed from the North State. I can be copied at jgoedert@frontier.net.net and I'd be interested in seeing the progress of the Delta conveyance project. Thank you
858	Rodney Deweese	If fresh water is to be used in Southern California for any other reason, it should be done by using the desalinization from the ocean and bringing fresh potable water in; that way the aquifer and the groundwater can be filtered and cleaned and naturally, and it will raise and increase the water purity and ability for our farmers have sustainable futures moving forward. Thank you
865	Phyllis Bala	— The lack of examination of options for water conservation and natural recharge of aquifers, and reducing the rampant misuse of water to benefit a handful of wealthy landowners at the expense of the majority of citizens
870	Dr. Gregg Wrisley	The Delta is in poor shape already as a result mainly of water removal. This project would kill one of the greatest estuaries in the world. As the climate crisis worsens, we need to be strengthening our environment, not destroying it. Once the Delta is destroyed, then where are we going to get water from? We must look for other sources of water now, not after we have destroyed the Delta. Things like water recycling, desalinization, more efficient water practices could go a long way toward helping to meet our water needs without destroying the Delta.
880	Muriel Strand	6. How can water users in the San Joaquin Valley and the Los Angeles area become self-sufficient in water resources, without using large amounts of electrical energy to transport water long distances?
880	Muriel Strand	8. Maximizing sustainability by minimizing energy-intensive water transport.
889	Todd Scruggs	This new plan will be disruptive and damaging to the Discovery Bay community. Smells from mud dug up, constant noise from the work going on. Possible structural damage to nearby homes due to heavy construction in the area causing the ground to shake. needs to move or remove this Discovery Bay shaft and alter the tunnel route away from Discovery Bay homes.
890	Cheyene DeWeese	If Southern California or any other region wants fresh potable water, it should use the desalination process from the Pacific Ocean. Desalination allows for farmers and ranchers of the central and northern valleys to

		use water which provides a sustainable future for agriculture (California grown fruits, vegetables, nuts, milk and so many other wonderful things).
891	Alice Neuhauser	The tunnel environment report (EIR)The tunnel environmental impact report (EIR) should consider the following: The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative.
891	Alice Neuhauser	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
894	Melanie Barna	Before any excavation is to be done, the EIR should analyze water conservation, efficiency, and implement reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
894	Melanie Barna	The EIR should analyze a “no tunnel” alternative and investment in water conservation and efficiency improvements to meet water supply needs and compare those improvements to the cost of production of said tunnel.
895	Jorge De Cecco	The tunnel environmental impact report (EIR) should consider the following: The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative.
895	Jorge De Cecco	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
901	Michael Davis	Please reconsider the Tunnel plan out of the Delta along with the new shaft planned by Discovery Bay. This will hurt my home value along with many other residents which I have worked hard for to take care of my family and enjoy our best lives. DWR needs to move or remove this Discovery Bay shaft and alter the tunnel route away from Discovery Bay homes.
904	Janette Saale-Baehr	The Byron Tract Maintenance Shaft needs to be moved or removed entirely away from the residential community of Discovery Bay. There are NUMEROUS intakes at the southern end on the Delta very close to Discovery Bay including the California Aqueduct and Delta Mendota Canal already sucking the life, and fish, out of Old River. Encourage statewide water conservation, drought resistant landscaping, desalinization, more water holding storage capability This is a BAD idea for a tunnel and shaft. STOP THE TUNNEL
911	Milt Baehr	DWR needs to move or remove this Discovery Bay shaft and alter the tunnel route away from Discovery Bay homes. All of the old issues remain if they chose the "Central Corridor".
917	Randall Gast	Please change the tunnel route to be away from our homes in Discovery Bay. This tunnel project will impact the values of our homes, the lifestyle of water sports, fishing, and the thousands of birds in this sanctuary. Many of us have moved to Discovery Bay, to enjoy living on the water in a quiet community, safe and without noise of heavy equipment pounding and drilling. There are over 1500 homes in Discovery Bay.

		Please push the tunnel further away from our homes. Highway 4 is extremely busy during the week with commuters going to and from work. Large trucks will severely impact the commute times.
921	Marsha & Michael Walsh	As a homeowner in Discovery Bay I am opposed to the proposed location of a tunnel and a shaft located adjacent to Discovery Bay homes. I strongly feel that it be removed/relocated to another site much farther away from our homes. It's amazing to me that any planner could conceive of such a location for this work!
933	Charles Robinson	In addition to a quantitative analysis of this project, include a thorough assessment of alternatives, including conservation.
943	Judith Richey	Monies not spent on desalinization is money wasted. Globally, desalination plants are popping up everywhere. The tunnel is OLD technology, and drawing water from the delta will pull the salt line further up the Bay setting up more destruction of natural ecosystems. Face the reality of climate change without destroying our precious planet any further.
945	Barbara Cullen	We recently received information that the single tunnel design for the primary “Central Corridor” (previously the WaterFix “Though-Delta Alignment” has been moved MUCH closer to Discovery Bay. The plan to put a tunnel shaft, with years and years of pile driving noise and pollution on the other side of Discovery Bay’s main slough. This is too close to the Discovery Bay homes. The tunnel route goes right next to the golf course homes. If they have a tunnel collapse, that would not be good for Discovery Bay homes. We have not been given any reason why they moved it here, right next to all our homes.
947	Michael W Stanaland Sr	The plans to put the new single tunnel so close to our community is a poor plan. We are against a tunnel anywhere in the Delta. There are other alternatives to a tunnel. The construction and confusion it will bring our community is a bad move. The tunnel will be much too close to our homes and will impact our community in a negative way. The DWR needs to move or remove the Discovery Bay shaft and alter the tunnel route away from Discovery Bay homes!
948	Eleanor Stanaland	The plans to put the new single tunnel so close to our community is ludicrous! We are against a tunnel anywhere (think about a desalination plant instead) let alone all the construction it will bring to our community. It will be much too close to our homes and will impact our community in a bad way! The DWR needs to move or remove the Discovery Bay shaft and alter the tunnel route away from Discovery Bay homes.
953	Jan McCleery	EIR Structure and Alternatives The BDCP/WaterFix EIR was a disaster. The various alternatives were discussed in each chapter. The format made it almost impossible to track which alternative was being described, especially due to the tens of thousands of pages. Alternatives to be considered: A) Three alternative routes need to be analyzed: (1) The NOP Eastern Corridor (2) The Independent Technical Review Committee's far eastern route near I-5. If it is determined that the ITRC's proposed "Stockton Shaft" has any impact on disadvantaged or environmental justice communities, a shaft further north from Stockton should be considered. But that route deserves review since it was recommended by the ITRC and by a different Independent Technical Board during the WaterFix era in 2010. (3) A No Tunnel alternative. This should NOT be analyzed as it was in WaterFix. It should be analyzed in conjunction with Newsom's other portfolio of projects like groundwater recharge, desalination, recycling, etc. (NOTE) It makes no

		sense to pursue the Central Corridor route. It was soundly rejected by the DSC Staff and the Delta stakeholders. But because MWD bought central Delta islands years ago, I wouldn't be surprised to still see it as an alternative. Impacts on Boating, Recreation, and Economies needs better research than was in the WaterFix EIR. In addition, impacts to highways and areas needing upgrades need to be researched. I sent in more details in my document attached to the email I sent in for the NOP Scoping. B) Alternatives for the North Intakes need to be evaluated based on impact to legacy communities, not just based on where DWR has an existing water right.
964	Stephen Rosenblum	The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative.
964	Stephen Rosenblum	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
966	Du Ng	Department of Water Resources’ EIR of the Delta Conveyance Project must include an analysis of a no tunnel” alternative. EIR should not only analyze the environmental and economic costs and benefits of the project and alternatives, but also consider the equity issues of those costs/benefits (i.e. who bears the costs and who reaps the benefits).
966	Du Ng	The EIR should analyze water conservation, efficiency, tiered pricing and other demand reduction measures that achieve the same water supply objectives without causing the environmental harms as the tunnel would.
969	Arthur Charles Knutson Jr	The tunnel project should be designed with mitigation of past damages to the Bay-Delta ecosystem in mind, because the ecosystem is currently in a state of collapse due primarily to excessive water diversions and water pollution. Moving the diversion point upriver from the South Delta to the North Delta will improve the health of the ecosystem and provide for better water diversion reliability ONLY IF the total amount of water diverted is equal to or less than the amount currently diverted. For fish, wildlife, and plants that require fresh or brackish water to survive, increasing freshwater flows into the estuary will create more habitat for populations of a high diversity of species to grow. The public trust doctrine requires that all of us seriously take improving environmental quality into consideration in the design and implementation of the tunnel project. The tunnel capacity should be determined with the two co-equal goals in mind - ecosystem restoration and RELIABILITY (not increasing) of water diversions. Future generations of Californians will thank you for that!
970	Mark Wilson	Alternative Project Proposal- The present proposed project should be replaced with a project that is integrated with the Sacramento Area Flood Control Agency project for widening the Sacramento Weir into the Yolo Bypass. A new pumping plant for the North Bay Aqueduct should be incorporated into the project as well. This project could use a pumping system or gate system on the frontage of the Sacramento River. If a gate system were used on the river frontage a pumping system in the bypass adjacent to the Sacramento Deep Water Ship Channel could pump water into the ship channel to flow south. Alternatively, with a pumping facility on the river frontage a pipeline could go to the ship channel or go into an above ground or

		shallow burial pipeline system for water delivery to the south. At the south end of the ship channel a gate/lock type facility would be constructed. At this point a pumping system would pump water into a shallow burial pipeline or above ground system to a point that is across from the southwestern tip of Grand Island. At this point tunnel under Sacramento River onto Brannon Island. At that point a shallow burial or above ground pipeline system would carry water south to a point at or near the most southern point of Sherman Island. At that point lay a shallow burial underwater pipeline system or tunnel under the San Joaquin River. From that point parallel the Contra Costa Canal to it's southern end with a shallow burial or above ground piping system. At that point the pipeline system would head south east of Knightsen and west of Discovery Bay. The pipeline system would cross Highway 4 and into the new forebay that is proposed. This proposal has many benefits over the project that DWR and the DCA is proposing. Following is a short list but by no means an exhaustive list of features and benefits. -This is a multi-benefit project that has cost sharing and flood protection benefits for Sacramento and the North Delta. - This is a multi-benefit project that has cost sharing and water supply benefits for the service area of the North Bay Aqueduct. - There are greater water quality benefits for the project, to include the North Bay Aqueduct, at this location. - This project location is just below the confluence of the Sacramento and Feather River and would be much closer to Sites Reservoir if it is built. This allows the pumping of stored water to be captured with much less loss of carriage water. - If the Sacramento Deep Water Shipping Channel were used as part of the project it would be both a conveyance component and a settling pond mechanism at the same time. Periodically it could be dredged to a depth of greater than 35 feet and provide a benefit to the Port of Sacramento. Ships with a deeper draft would be able to use the port. - The expected project life would increase because it is at a higher elevation. - Construction of the project will be much less disruptive to Delta agriculture and Delta communities. - Cost of the project will be lower and technically simpler. - It would be much easier to make this alternative project resistant to seismic events and easier to repair if damaged by seismic events. - The project can be completed in a shorter timeframe. - Operations, maintenance, trouble shooting and repairs to this project alternative will be simpler and less expensive. As stated earlier there are many other features and benefits of this alternative project proposal compared to the present proposed project.
974	Lynda Mosher	I find it almost inconceivable that California would seriously consider a huge, expensive water project that does not create one new drop of water and pits one part of the state against another. This is a 20th century solution to a 21st century problem. As we see more impacts from climate change, the state needs to use its current water supply more wisely, reducing usage and reusing water where possible, while seeking out new sources and moving to regional self-sufficiency. What better way to do that than to move more toward desalination using renewable energy sources? The state has a very long coast line and certainly the technological capabilities to bring this about. As we see ocean levels rise all over the world and on our own coastline due to climate change, we need to take less water from the Delta, not more, to safeguard the quality of the water that we may continue take from salt water intrusion. We also need to reduce the amount of water that we pump from wells so that the aquifers can be replenished and sustained. Let's create more fresh water for all through desalinization -- and be an example for the nation as we have been during the Covid-19 pandemic.

977	Karen Wilson	Consider altering current operations. Alternatives should consider non-tunnel and non-diversion alternatives.
978	Michael McCleery	I am disappointed that DWR has not postponed the comment period to a time when we can meet without Stay in Place Orders. DWR has apparently made matters worse for us Discovery Bay residents by moving a tunnel shaft so close to Discovery Bay, and drilling almost under houses on the east side of Discovery Bay. Why? Without the Covid issue, traffic is a major problem on Highway 4, trucking here will make that a nightmare. Drilling night and day for years will reduce our property values dramatically, and we won't be able to sleep. The scoping for mitigation of sea level rise MUST look at an alternative that meets the joint requirements of the Delta Plan Act of protecting the ecology of the delta. A tunnel that removes water near Sacramento exacerbates an already serious ecological problem already faced in the Delta by allowing further salt water intrusion and reduced flows to the Bay and beyond. You MUST look at local water alternatives for the Metropolitan Water District such as desalination.
912, 913	Barbara S Chapman	As a fifth generation Californian I am deeply concerned about, and profoundly skeptical of, the proposed Delta "conveyance" project. Particularly worrying is the agribusiness protection approach taken by you and DWR in promoting this project. Following the worst year of drought in 500 years (2015), one would think you might reconsider business as usual in state water distribution. I refer you to the letter sent by Restore the Delta on March 20, 2020 for details on what you should be considering with respect to the project's purpose, realistic supply of water in a changing climate, effect on Northern California communities, actual projected cost burden, opportunity cost of not pursuing better water infrastructure improvements, valid alternative measures to reach the objectives of the project, and proper analysis of its environmental impacts.
973	Laurie Yglesia	Their Independent Technical Review Committee (ITRC) reviewed the plans and reported that the Central Corridor is not acceptable for a huge tunnel construction project. They recommended a route further east, near I-5, to take advantage of that existing large freeway and going around the Delta instead of through it. We've always been surprised a further east route hasn't always been the main focus because the additional noise and pollution would be less impactful than through the estuary. Here's the ITRC recommendation. Regardless, DWR summarily rejected it. (A different independent technical board recommended the same route in 2010 which DWR rejected then, also.) Of course, there are still issues with this Far East I-5 Route: - Horrible impacts on the historic legacy communities in the north where they would still be building the intakes practically on top of those communities. - Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta.
992	William J. Wilson Rancho California Water District	Overall, I support the proposed project alternative for delta conveyance, one tunnel, sized to convey 6,000 cfs of water for the SWP agencies such as Metropolitan Water District of Southern California. While it is appropriate for the environmental process to examine a range of sizes, previous analyses have shown that smaller facilities do not proportionately reduce costs as opportunities to sufficiently capture high storm water flows cannot be achieved. Further, the proposed project and alternatives being evaluated should be “cost effective”, meaning they must make economic sense for the PWAs that will be funding all of the costs. We believe a 6,000 cfs facility has the greatest possibility of accomplishing this need. I understand that the

		costs as compared to proportion of benefits goes up sharply as the capacity is reduced significantly below 6,000 cfs. Therefore the EIR should not evaluate alternative capacities that the PWA investors would have no interest in funding because the economic benefits and cost effectiveness does not exist.
992	William J. Wilson Rancho California Water District	A 6,000 CFS tunnel facility would require two intakes in the northern Delta. I support examining the three possible intake locations that had been fully vetted during the previous California Water Fix planning process. These locations were carefully identified to minimize impacts to migrating fisheries and nearby Delta communities while taking into account potential sea level rise.

992	William J. Wilson Rancho California Water District	I also support the two corridors to be examined for the tunnel facility, a "central" route similar to that of California WaterFix and an "eastern" route closer to Interstate 5. Fully examining these two alternatives stands great promise in identifying an ultimate route that minimizes impacts and hopefully identifies "win-win" benefits to the Delta region.
998	Sean Cudney	California needs to find alternative solutions to the “water fix” than taking more water out of the Delta.
999	Tara Beeman	As I understand it, there are alternatives to continuing this project, including the investment into sources of local water supply for all communities and parties involved. Why continue this costly and destructive project when alternatives exist?
1002	Dr. June Dampin	There are other methods of water conservation that should be looked at that have much less of a negative impact such as expanding the water in reservoirs, building new reservoirs, recharging groundwater, recycling water, desalinization, getting water from the air with new technologies, and more. These other methods are also less costly and wouldn’t require the same level of land takeover, etc. And they could help the whole state.
1004	Blythe Reis and Mark DuPont	The EIR should analyze alternative that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative.
1004	Blythe Reis and Mark DuPont	The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful and more economical than the tunnel and achieve the same water supply reliability goals and targets.
1004	Blythe Reis and Mark DuPont	The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a “no tunnel” alternative and investment in water conservation and efficiency improvements to meet water supply needs.

Table D-14. Comments the Approach to the Analysis

Letter	Commenter Name, Affiliation	Comment Text
1	Dee Joyce	Please look to the science. Look to the health of the Delta before the greed of those who do not appreciate the gifts that the Delta brings to all.
5	Shoshana Bianchi-McElwee	As you know, this is a critical ecosystem, and a power grab by Southern California to boot. As a Northern Californian, I have to ask you that you use sound science as the basis for deciding whether to move forward with the single-tunnel project.
10	Jim Blickenstaff, Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	1] Preparing impeccably documented, scientifically based, research that will then logically and rationally, support and justify, findings and conclusions, as to best option(s) for proceeding on the goal of enhanced water supply AND Minimized detrimental environmental impacts. Anything less will invite more water battles. Failing Examples: > Trump "Science." Or, Reverse Science , where a predetermined outcome causes the scientific effort to be compromised, and otherwise undermined, (incl., the firing of scientists who's findings were not sufficiently contorted toward the desired outcome), all in order to arrive at the desired outcome. Part of this flawed approach would be mitigations that don't mitigate, such as "habitat restoration" as a misplaced counter to aquatic degradation from reducing fresh water flows. > A narrowly focused scientific analysis that does not encompass all available and pertinent information bearing on finding the best (minimized short and long term environmental damage balanced with cost efficiency) outcome.
10	Jim Blickenstaff, Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	Once all the above is done with the thorough, and necessary, scientific rigor --inclusive of a process and presentation unfettered by outcome bias-- the alternatives will become more apparent and meaningful as solutions to a lead plan that can, and will, only contribute to the pending environmental collapse of the S.F. Bay Delta.
13	Michael Seaman	An honest, science-based approach to the proposed project would terminate the project before wasting money on a CEQA analysis.
29	Hope Salzer	The EIR must analyze the tunnel's cumulative and collective impacts, with particular focus on: impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents;
29	Hope Salzer	The EIR must analyze the tunnel's cumulative and collective impacts, with particular focus on: Impacts incurred during construction of the tunnel and the reservoirs required for water storage

36	Woody Nedom	The National Academy of Sciences has made clear that the Delta's long-term health depends upon allowing more water - not less - to flow through its ecosystem. The National Academy of Sciences is the "gold standard" of environmental analysis. Its findings are based upon science, unadulterated by partisan or political considerations. I urge you to use the findings of the Academy as the foundation for your review. I would also urge you to have the courage not to engage in sophistry to seek a compromise, or use "science" formulated by partisan goals as a rationale for weakening or disregarding the Academy's incontrovertible analysis.
37	Esme Shaller	I'm writing to express my dismay that Governor Newsom may be caving to Trump-suspect science in determining whether or not a single tunnel will suffice in the Bay Delta. As you know, this is a critical ecosystem, and a power grab by Southern California to boot. As a Northern Californian, I have to ask you that you use sound science as the basis for deciding whether to move forward with the single-tunnel project.
38	Sharon Keeton	Please do not accept the Trump administration's "science" to justify the building of a tunnel that would siphon water from the delta. The delta provides a third of the fresh water to the Bay Area and is home to 750 species of animals and plants that are essential to its fragile ecosystem. The Trump administration's proposal is not scientifically adequate and falls short of protecting the delta. We need to use sound science to decide whether to move forward with the single tunnel project.
40	Sherry Wilcoxson	Please use SOUND SCIENCE when deciding whether to move forward with the single tunnel project. You MUST protect and restore the fragile Delta ecosystem.
41	Louise Harm	I'm writing to express my dismay that Governor Newsom may be caving to Trump-suspect science in determining whether or not a single tunnel will suffice in the Bay Delta. As you know, this is a critical ecosystem, and a power grab by Southern California to boot. As a Northern Californian, I have to ask you that you use sound science as the basis for deciding whether to move forward with the single-tunnel project. I think you'll find the science shows that a tunnel project in this essential and fragile habitat can have severe consequences.
42	Peter Marini	As a concerned California citizen I want to speak out and insist that sound science be used as a basis for determining whether to go ahead with a the Delta tunnel project that is currently under consideration. The Delta is a natural resource to all Californians and the faulty science that argues for the creation of a massive tunnel to divert water from the Delta to the south must not be the deciding factor in the approval or disapproval of this proposed project.
43	Rachael Hopper	It is VERY important to use SOUND SCIENCE to determine if it is a good idea to go ahead with the single tunnel plan. Our Delta is vital to the environment and Trump would like nothing better than to see it destroyed. Using his questionable version of science just isn't good enough. We must protect the long term health of the Delta for future generations.
44	Pete Hansen	As a concerned Californian I ask, no insist, that the Department of Water Resources use sound science as the basis for deciding whether to move forward with the single-tunnel project.

45	May Lee	I'm writing to express my dismay that Governor Newsom may be caving to Trump-suspect science in determining whether or not a single tunnel will suffice in the Bay Delta. As you know, this is a critical ecosystem, and a power grab by Southern California to boot. As a Northern Californian, I have to ask you that you use sound science as the basis for deciding whether to move forward with the single-tunnel project.
46	Barbara Cohen	I'm writing to express my dismay that Governor Newsom may be caving to Trump-suspect science in determining whether or not a single tunnel will suffice in the Bay Delta. As you know, this is a critical ecosystem, and a power grab by Southern California to boot. As a Northern Californian, I have to ask you that you use sound science as the basis for deciding whether to move forward with the single-tunnel project.
47	Mark Bailey	I have read numerous assessments on how we could "improve" water diversion in the Delta. They all stink. WE SHOULDNT BE ROBBING THE DELTA and it's multitude of life forms for corporate (or any other) profit. We should leave the place alone dammit! I learned to swim in the Sacramento River. As a scientist and having been raised on the Sacramento River I can say with certainty that water diversion is extremely harmful to the delta and all of its dependent organisms. There is simply no way it can be done without major harm to the environment. I wonder how many times I will have to comment about this scheme and it's predecessors. Over the years, I have sent comments re all of these schemes. I've always been AGAINST WATER DIVERSIONS 0and I always will in whatever form it raises its ugly head. VOTERS HAVE ALSO REJECTED IT previously. When will you drop this ugly idea? Sure, farmers need water but I have no love for major agribusiness corporations. They don't deserve ruining our Sacramento River Delta for their profit. JUST DROP THIS DAMN SCHEME, WILL YOU?
48	Libby Lucas	Request you also address these specific areas of concern: - allocations of water supply including historical water rights, historical precedent, and fishery, agricultural and urban allocations
54	Lisa Van Valkenburgh	I implore you to consider sound science in deciding if the single tunnel project will protect the health of the Delta now and in the future. It has been scientifically proven that more water sent through the Delta is imperative environmentally, not less! Please discard the idea of even ONE tunnel. The sole purpose of which is to send more water to Southern California. As I recall, during the drought it was southern Californians who disregarded conservation efforts and used just as much water as always. And now we should send them more?!? This should not be a political decision but rather one based on science alone.
56	Carolyn McCall	We urge this council to resist attempts to siphon more water from North to South CA without adequate environmental review!
59	Carl Tilchen	Must use sound science to share water! Trump doesn't care & doesn't know about correct water use. Conserve water & wildlife in the Delta & all California. Please click hewww.youtube.com/watch?v=eX-tHquzeo8
60	Michele Kelly-Jones	I sincerely hope you will vote against a single tunnel plan for California. This would truly endanger the fragile ecosystem in the Delta. Thank you for your attention to my opinion & that of multiple scientific studies. Please do not use Trump administration scientific research!
62	Pamela Burns	Please use sound science as the basis for deciding whether to move forward with the single tunnel project! The health of the Delta depends on it.

63	Deb Donovan	We understand the complexity of water policy, but science must prevail. Please reduce the proposed use of delta water to a sustainable level. I am a retired environmental lawyer who worked for California agriculture-but we need a science based balance
65	David F. Scatena	Failure to protect the Delta & S.F. Bay estuaries would be a disaster for current Californians who live at or near these estuaries and all California generations that follow!
66	Sherrill Hedman	I beg you to use sound science as the basis for moving forward with the single-tunnel project! Do not let yourselves be influenced by some pseudo-scientific "Trumped up" data. Please protect our unique Delta's water supply and ecosystem.
75	Kevin Heldt	Please require sound science as the Basis for deciding on whether to move forward with the single tunnel project .
81	Jan Warren	Use sound science before proceeding with a single new tunnel to convey water through the Delta to S. CA.
83	James Marsh Friends of the Calaveras River	Any form of conveyance will effectively kill the Delta.
88	David Wittrock	On the Monterey Peninsula where I live, we have our own problems with water and the use of bad federal science to overcome, but that should not be something the state of California should swallow. Nor should the bad science of the federal government be used in designing the single tunnel to supply water to the south at the expense of the Delta. Governor Newsom's advocacy of a single tunnel moving water from the Delta in a way that protects that watershed by reducing flow is the only way to do multiple good things at the same time: preserve the Delta and its environment, and give the south the water it needs.
89	Gary Brown	I strongly urge the DWR to stop the current path toward the single Delta tunnel. A complete review of the justification for this proposal must be performed by impartial scientists. The politics of our divided country can not be used to determine California’s water future.
90	Jeri Opalk	I specifically ask you to please not capitulate to the Trump Administration and Trump allies; they don't care about California or wildlife. Californians do. Please use valid science in making your decision, not the politically contrived pseudo science of the Trump administration.
91	Shelia Gorsuch	Use sound science as the basis for deciding whether to move forward with this project– -- do NOT use faulty Trump science, which will thrash the environment completely. Our Delta ecosystem is too fragile– -- be aware and save the heritage of your grandchildren.
92	Karen Cohen	The operating rules on water flows proposed by the Trump administration do not protect wildlife— and the people of the state. I urge you to use sound science— and not the administration’s proposed rules–-- as you review plans for a single tunnel.

93	Susan Merserve	I'm writing to express my dismay that Governor Newsom may be caving to Trump-suspect science in determining whether or not a single tunnel will suffice in the Bay Delta. As you know, this is a critical ecosystem, and a power grab by Southern California to boot. As a Northern Californian, I have to ask you that you use sound science as the basis for deciding whether to move forward with the single-tunnel project. I think you'll find it's not enough.
94	Maren Stanczak	I strongly request that you use sound science, rather than the specious reasoning provided by the Trump administration as the basis for your decision of whether or not to move forward with the Single Tunnel project in the Delta. I remain concerned that transferring large amounts of water to southern California may increasingly threaten the health of the Delta.
95	Curnie Webster	Californians care deeply about our environment. We tend to care more deeply than the rest of the world (especially most of our states in this country). Please insure that we do what's best for our ecological system when we proceed with this development. You must follow sound practices to enhance our environment for the benefit of the generations to come. Don't forget that!
96	Ed and Jeanne Griffiths	Please stop the tunnel by using sound science that will show that even one tunnel will do irreparable damage to the Delta. The Delta is a natural marvel that is vital to the humans, wildlife and habitat of the Delta region and northern California. Let’s not destroy it with the tunnel. SoCal needs to figure out another way to get their water and not steal it from the Delta. Yes, the word is “stealing”.
102	Kevin Heldt	Please require sound science as the Basis for deciding on whether to move forward with the single tunnel project.
104	Paul and Lynda Roy	Thank you for considering these thoughts; I’m sure there’s thousands upon thousands of other citizens who feel just as strongly that independent scientific study needs to be applied to this before you make any decisions about going forward.
108	Noel Eberhardt	When deciding on moving forward with the single tunnel project, I insist you use sound science as a basis of your decision. The long term health and survival of the delta must take precedence over maximizing water diversion to the south.
109	Mike Speckman	I urge you to protect our fragile delta and waterways. The political means do not justify the permanent damage the Delta Tunnel will create. Please allow the science and environmental sound practices be at the heart of your decision for us and our future children.
111	Geoff Coombes	My child is 3 years old and loves fishing and the outdoors. You need to use real science to stop this water grab bc it can has a potential to destroy all that is amazing about the wild habitat we call the delta. We all plead with you to make the right choice that will not destroy our water ways and kill thousand of animals that need the delta water for survival . Use science not greed for money.

115	Susan Simpson	Some may believe that One Tunnel is a compromise to the defeated Twin Tunnel "Water Fix" Project. It is not. The One Tunnel, "Delta Conveyance Project" is just a Water Fix/Peripheral Canal do-over. It may sound like One Tunnel might be less expensive or less devastating to those in its path. It's footprint would be just as irreparable as the previous Twin Tunnel Project. There will still be: Estimated 13 years of construction/destruction Same proposed intake location Same proposed closure of vital Delta waterways Relentless pile driving and heavy construction equipment noise Seismic impact in California Historic Communities Seismic impact adversely impacting native species Crippling traffic impacting all Delta Highways Levees and levee roads crushed by the constant barrage of construction equipment Local Delta business will be decimated
126	Lisa Hoivik	Multiple scientific studies including one by the prestigious National Academy of Sciences, have made it very clear that the long term health of the Delta depends on pouring more, not less, water through its 1,000 miles of levees. The governor's single tunnel plan must provide a more reliable water supply for California as well as protecting, restoring and enhancing the Delta ecosystem. It is critical that SOUND SCIENCE be the basis for deciding whether to move forward with the single tunnel project.
135	Bayla Greenspoon	It is only in the past 200 years that severe degradation of the rivers has occurred due to unlimited use of natural resources and the use of dams. The Delta Conveyance will add to this degradation.
137	Ellen Koivisto	Why? Because a biosphere is not a plumbing project. It cannot be relaid without enormous loss of biodiversity, life, and resilience. Doing something this damaging is criminal; doing it in an era of rapid climate change and during a mass extinction event is suicidal.
137	Ellen Koivisto	Specifically, California may be a single state, but it is composed of different bioregions that have different ecosystems depending on very different combinations of biotic and abiotic participants. Southern California is desert while northern California is temperate rain forest to the west and sagebrush steppe to the east. The Sierra's biomes are dependent on elevation. Don't take my word for it; look in any high school level science text or lesson plan. That means the north is meant to be wet and the south is meant to be dry.
137	Ellen Koivisto	So, you take away the water, which kills the fish, which kills the forest. An absent forest can no longer trap rain. The north dries up, it decertifies, leaving no water to ship south to that desert anymore. It's a Rube Goldberg death machine. You kill both the north and the south with one incredibly stupid and scientifically ignorant idea, benefitting the very few, temporarily, at the cost of life in CA permanently. And, really, did it never occur to you all that if you're agreeing with Trump about science issues that you're on the wrong side? Covid-19 should make you wary of being in bed with his anti-science storm troopers, if nothing else gets through the fog of denial and lobbying that temporarily shields Sacramento from reality. But you do know it's just temporary, right? There is no hiding from any of this on-going disaster anymore, and pretending that business as usual is the way to go is condemning us all to the worst possible outcomes in the quickest timeframes.

142	Barbara Tortorici	I wish for the Department of Water Resources to take note that I am against the construction of the tunnel through the Sacramento Delta. Even a single tunnel will be so harmful to the surrounding area which includes our own water quality, wildlife, environment and the serious impact it will have on boaters that wish to access the Delta during construction and in years to come following completion of the project. Please take the necessary steps needed to stop this detrimental project to our great and vibrant Delta.
145	Meredith Cooper	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents;
145	Meredith Cooper	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: Impacts incurred during construction of the tunnel
155	Samuel Butler	I am writing to express my opposition to the building of any tunnel to divert water from the northern California delta. All of the iterations of this proposed project have been and are a terrible waste of money. They would also cause further environmental damage to an ecosystem which is already highly stressed due to human action and climate change.
162	Gene Beley	Plus it will devastate the Delta economy, run people out of their homes, and threaten legacy communities like Locke—where buildings may even collapse with the pile drivers going for long periods of time in that area, plus all the big trucks plying those roads.
168	Rachel Rolnicki Orange County Business Council	OCBC fully endorses a thorough EIR that accounts for all environmental impacts to the Sacramento-San Joaquin River Delta. Restoring the Delta ecosystem and fortifying water supply reliability are co-equal goals. Achieving these goals through the Project is perhaps the greatest infrastructure challenge facing the state, but is absolutely necessary that the Governor's plan succeeds.

176	Jacklyn Shaw	Given the larger map options of Terminous Tunnel (DWR, EIR), 12 miles from Lodi City Hall, this is responding to Mavens Notebook, March 12? (It “s "on Delta Conveyance”, or “modernizing" what informed Californians voted against in 1982.) It is horrifying, double-talk, “disingenuous” and "devastating on any Delta tunnel plan", to the Supervisors Coalition of Five Delta Counties. That is a dust-kicking, with Delta Breeze, for an another "EMPTY, UNDERGROUND BULLET TRAIN BOONDOGGLE, AND WATER SOCIALISM” That is by "water redistribution" 300 miles (to Hanford, dune buggy racing and Fiji Water man), privy grants, former elected officials as bond profiteers and endless water boarding meetings"? It is displacing GENERATIONAL AGRI-TOURISM to USA & world and RECREATIONAL MARINAS, like Tower Park with Levees. Then it would be to temporary construction jobs, amidst critical water overdraft (Woodbridge/WID vs East Bay/EBMUD, Mokelumne River Aqueduct to PORT of Oakland, since 1929). Here is proof that water exports are nonsense (besides failed water exports of dry Mono Lake to LA, Anderson Dam to Silicon flooding, etc.) Lodi raised watermelons with three months fog; now it is a few weeks fog with worst drought in February for Lodi recorded history, with fruits, nuts and more. Increasing cycles of SOIL SALINITY makes MORE DROUGHT STATEWIDE. Scientists say “Delta conveyance" is "NOT PRACTICAL”. So, for Westlands just play it west side of the Delta River (for Duck Hunters, or switch and bait)! Why did DESALINATON grants go to 16 states, but not California Coast with 90% of Californians? It was invented at UCB with article Jacques Leibovitz, 1977. Then DESAL has been used in over 100 nations. San Francisco has had idle Desalination plant; how about Port of Oakland, near Stanford salt energy research? Bakersfield basin can serve for Desalination, with Delta Conveyance plans and state university students learning more than one option for Water Smarts. To avoid flooding propaganda, restore Deep, Pure DREDGING, from Rio Vista to Antioch Bay. Also, who owns the Freeport intake, Sacramento, on Interstate five, I-5? SAVE THE RIVERS. Thanks for public comments.
203	Patricia Osborn	Comment out of scope because it applies directly to the Shasta Dam Raise. The comments in this letter are not directly applicable to Delta Conveyance but issues brought up in the letter will be considered in the EIR: Air Quality, Water Quality, Traffic, Cultural Resources.
214	Will Harling Mid Klamath Watershed Council	Analyze cumulative impacts of tunnel on Shasta Dam Raise, Sites Reservoir, Trump Water Plan Contracts, and State Water Project.
234	Marin Harris Terra Land Group, LLC	Comment includes three attachments. Attachment 1 is a letter from Terra Land Group, LLC to the Tri-Dam Project. Attachment 2 is a letter from Terra Land Group, LLC to the Manteca City Council. Attachment 3 is a letter from Terra Land Group, LLC to the San Joaquin Area Flood Control Agency. All three attachments raise concerns regarding flooding and impacts to flood control systems.
237	Jacklyn Shaw	Comment expresses concerns regarding the use sound science as it relates to water management in California. The comment expresses specific concerns regarding the science used in the recent Biological Opinions issued for the long-term operation of the Central Valley Project as well as the information put forth by the State Water Resources Control Board regarding scientific basis for updating the Bay-Delta Water Quality Control Plan. .

241	Ann Dorsey	The EIR must analyze the tunnel's cumulative impacts, with particular focus on global climate change impacts; water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of fresh water in the Delta; biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and Impacts incurred during construction of the tunnel and the reservoirs required for water storage.
248	Tom Williams	Provide quantitative and explicit current Project Goals/Objectives/Policies and Purposes/Needs for Public proposing of mitigative/compensatory alternatives. Provide direct numerical relations for current proposed Project, any current alternatives, and current GOP/PNs. Provide numerical/quantified definitions of "reliability" and for "potentially" for this review and previously for water resources reviews by DWR during 2015-2021.
248	Tom Williams	Provide an updated draft of the Costs, Benefits, Cost Analysis, and Financial Analysis commensurate with the staged assessment and mitigation for the proposed Project.:
248	Tom Williams	Provide clear definitions and procedural estimations for "risks", "threats", "likely", "could's, would's and should's", and "can's, will's, shall's, and must's" Provide definitions and quantifications for "reliability", "reliably", "flexible", and "flexibility". Provide technical, numeric, and quantitative reviews and analyses of structural behaviors and movements of: fixed air-filled vertical shafts without any tunnels, single empty/air-filled tunnels within 300ft of the shafts, twin empty/air-filled tunnels within 300ft of starter shafts, single-/twin empty/air-filled within 300ft of receiver shafts, fixed air-filled vertical shafts with air-filled tunnels with 0.0, 0.5, 0.7, and 1.0 G accelerations; fixed partially water-filled vertical shafts with water-filled tunnels with 0.0, 0.5, 0.7, and 1.0 G accelerations; Provide numeric, quantitative assessment/definitions for any use of cost-effective, efficient, economic, financial, or other non-physical describer.

248	Tom Williams	Provide definition and description of "tunnel shaft" and its relationship to the intake (northern) forebay and alternatives for cut-&-cover, shallow, and deep intake tunnels. Provide list of "reasonably foreseeable potential contract modifications", e.g., increased diameter, multiple diversions(intakes), additional TBM Shafts, etc., and additional assessment, mitigation, and monitoring, and reporting plans, including recirculation of Amended DEIR/DEIS) for any "Contract Amendment (Project Description, changes). Provide definitions, tabular, and graphical/numeric delineations for "Project Area", "Study Areas", "Regions", "Service Areas", "Resource Areas", all water recipients and contractors for local distributions Provide simplest physical alternative for the Project alignment, dead-straight path from uppermost diversion on Sacramento River to the Intake facility for the Clinton Forebay with at least one shaft (mid point) and not more than four equally space shafts for tunnel-boring-machine drives /starters and reception/receivers, excluding any shafts at start and finish. Provide text, graphical, numeric and Process Flow Diagrams (PFD/P&ID) descriptions including connections to all districts and end-users of water through the tunnel(s) and Delta Fore Bay. Provide text, graphical, numeric and Process Flow Diagrams (PFD/P&ID) descriptions for identified components (e.g., inlets, inlet-forebay tunnels and shafts, shafts for both forebays, Define, delineate, and describe specifically "connecting tunnel reaches. Provide definitions, delineation, and description specifically for "launch" compared to "retrieval" shafts and alternatives of double launch, of double retrieval shafts, and of combined retrieval/launch shafts. Provide description of Site recovery including demolition/removal of 45ft high concrete shaft freeboard and earthen reuse.
258	Barbara Barrigan-Parilla Restore the Delta	There is no scoping for total infrastructure. Impacts will be cumulative, including air quality between all the air district regions within the Delta. Scoping for all impacts from the Trinity and Klamath area for our tribal brothers and sisters to environmental justice communities in San Diego where they are already paying for the highest rates for water have to be done.
269	Jeff Durbin	I keep hearing about best available science, which, to me, is best available silence. It's the scientific method that we use. It can include the best available science, but that looks at everything, not just what we want to look at.

313	Mike Lynes Audubon California	The MBCP letter expressed concern about the many uncertainties in the DEIS/DEIR's assessment of impacts, planned conservation measures, and vaguely defined adaptive management measures. Given the similarities between projects it is imperative that these concerns also be considered under the currently proposed Project. Specifically, we expressed concern and provided recommendations regarding the following: •the DEIS/DEIR's overly-narrowed focus on threatened and endangered species, which missed opportunities to slightly adjust conservation measures in order to provide benefits to a broader array of species that would suffer impacts arising from the projects; •the importance of post-harvest management as a boon for habitat quality and the recommendation that post-harvest, wildlife-friendly agricultural practices be included among conservation measures; •the incomplete consideration of the conservation benefits of improved water management and vulnerabilities arising from climate change impacts to water delivery in areas where restoration may occur; •the DEIS/DEIR's failure to include as a stated goal the maintenance or improvement of water deliveries to wildlife refuges, which will suffer direct and indirect impacts arising from the project; •the overall failure to account for impacts of climate change on habitat restoration and protection activities and the failure to apply "climate-smart" principles in the planning effort; •the lack of monitoring for shorebirds, waterfowl, and riparian songbirds, which, if remedied, would provide for an effective monitoring tool for ongoing restoration and effects arising from the project; and •the lack of an adequate adaptive management plan, informed by ongoing monitoring and reinforced by specific benchmarks, triggers, and actions that would be taken if impacts or mitigation measures had unanticipated results. While Audubon was pleased to see several improvements during the BDCP/WaterFix process, we noted that all of the above referenced concerns remained in the RDEIR/SDEIS for that project, and therefore these concerns remain for the currently proposed Project.
331	Sol Jobrack Stockton City Council	One of the things of being on the council, we often have to make tough decisions.· And I served four years on the Planning Commission. And during my time on the Planning Commission, we had to redo our general plan. A lot of that was because of due to poor planning. So we ended up having to be the ones that cleaned up the messes of the past. And I try to take that and those feelings into my role as a council member in the decisions I make today. Those past decisions have current impacts.
339	Chris Neudeck Kjeldsen, Sinnock & Neudeck	The Delta is a very sensitive area, and it's a very severe area when it comes to impacts, and I seek to have that done as well.
343	Margo Praus Sierra Club of California Member	We will be impacted. The EIR should do its analysis of the economic and environmental cost and benefits of the single tunnel project.
382	Russel van Loben Sels	I have several concerns on the Notice of Preparation. The first one is, on page 3, there's an assumption that the tunnel muck will be reusable tunnel material. It's sort of like: Kazaam, we have tunnel muck; now we have reusable tunnel material, without any analysis. So I believe, in any environmental analysis, you have to assume that this material will not be reusable, will have to be stored, will have to be treated. And until you even analyze it, I don't think you can assume it's reusable tunnel material. So I prefer that you call "tunnel muck," which it really is and not, RT", "reasonable tunnel material."

382	Russel van Loben Sels	Impacts should be analyzed not only individually but cumulatively. In the California Water Fix, there were 65 individual impacts that impacted agriculture resources in the Delta. Twenty of those were significant and unavoidable, but yet there was no cumulative evaluation of what that really did to that resource. So I would encourage you to not only do those evaluations individually but also cumulatively.
435	Russel van Loben Sels	Cumulative, as well as individual impacts, should be studied in the EIR. Resources and communities will be subjected to multiple negative impacts, which will amplify the negative impacts and affects on them. Residents of Legacy communities might be able to withstand some negative impacts for a short period of time, but when considered cumulatively over a ten-year period, they may not make life tolerable in these communities. The EIR should analyze the cumulative impacts of all negative impacts on Delta resources and communities. Mitigation must be feasible, fully enforceable, and adequately financed and monitored.
515	Lisa Combs	Science has not supported two tunnels.
537	Patricia Ziobro	We are concerned about the prospect of unknown damage to the environment from the single tunnel, both during and after construction.
542	Bruce Campbell	If water from a certain watershed is unnaturally diverted to then flow down the Sacramento River instead of where Mother Nature intended it to go, I strongly contend that it should be considered “upstream from the delta” in terms of analyses that need to be done to better inform the public and agencies about threats from cumulative impacts relating to the DCP and the impacts from its more or less statewide plumbing network. If the Delta tunnel is likely to(or even might) “convey” (at any time) water from a given source watershed/water body apparently to this newly proposed “augmented” additional South Delta pumping station(though I cannot seem to locate it on a map within the NOP), then those watersheds must be thoroughly evaluated in the Draft EIR in terms of hydrology, species (including listed species like native anadromous fish), and cultural, spiritual, and physical resources of federally recognized tribes (as well as other native people of the area).
542	Bruce Campbell	One thing that needs to be analyzed in the EIR pertaining to Trinity River diversions (and flow of that watercourse downstream from the lake/dam) is the LIKELIHOOD OF REPRODUCTIVESUCCESS WITHIN THE TRINITY RIVER WATERSHED FOR NATIVE ANADRAMOUS FISH SPECIESINCLUDING NATIVE SPRING CHINOOK SALMON, NATIVE FALL CHINOOK SALMON, AS WELLAS COHO SALMON. If, on the other hand, you choose not to do thorough analyses of the impacts of additional water diversions on listed species and on native cultural and spiritual values in the Trinity-Klamath watershed, THEN YOU ARE WELCOME TO REMOVE THETRINITY RIVER FROM YOUR LIST OF WATER SOURCES TO RAID (raid additionally, if at all --because Humboldt County tribes are not getting their promised flows even at present)!

542	Bruce Campbell	Part of the analysis that should be required is how taking more water out of Trinity Lake(to feed the thirst of Central Valley farmers) would impact the flows of the Trinity River, and what those reduced flows would mean in terms of literal survival of native anadromous salmon species in the Trinity River watershed in order to complete their lifecycle by coming back upstream to lay or fertilize fish eggs. There are some hatcheries around, but there still are fairly small numbers especially of native Spring Chinook as well as of native Coho salmon in the Trinity River watershed. There is a half-way decent Spring Chinook run in the Salmon River (a tributary to the Klamath River before the Trinity River drains into it),but more genetic diversity is desperately needed particularly for Spring Chinook and Coho salmon on the Trinity River side of the Weitchpec divide as it were. While there should be analyses of potential cumulative impacts to Fall Chinook and other species as well, but I am especially TRYING TO BRING ATTENTION TO THE MAJOR NEED TO THOROUGHLY ANALYZEWHAT REDUCED TRINITY RIVER FLOWS WOULD MEAN (INCLUDING OVER THE MID AND LONGTERM) IN TERMS OF GENETIC DIVERSITY AND EVEN MERE SURVIVAL OF NATIVE SPRINGCHINOOK, FALL CHINOOK, AND COHO SALMON POPULATIONS IN THAT WATERSHED. Simply getting more Spring Chinooks to hatch at a hatchery will not suffice for genetic diversity of that species, and even they prefer more natural flows rather than having their water siphoned off for powerful agricultural interests in the Central Valley. Plus, Coho salmon numbers are woefully low as well in the Trinity River watershed, but there are still some Coho in French Creek and other small streams along the mainstem Trinity, plus some low numbers in a few streams of the South Fork Trinity River. The health and flow level of the Trinity River is essential for the Coho salmon who needs a reasonable level of flow to make the trek back up the Trinity to lay and fertilize eggs in smaller fairly intact tributary streams, while the Spring and Fall Chinook also prefer a good amount of water in what one of the maps called the “Trinity System” to access their preferred remaining habitats.
542	Bruce Campbell	There is not supposed to be “piece-mealing” under CEQA. So, either do full analyses including of areas whose watersheds will be further drained of water as part of the DCP Draft EIR, or else forbid those sources of water (or at least additional water beyond the usual amount obtained in recent years) to be used to feed the Sacramento River and its proposed DCP tunnel !!
542	Bruce Campbell	Please consider each and every species of the Delta region, and then ponder what cumulative impacts there will be on those species from the combination of long construction period at a depth of 190 feet, depriving the Delta and outflow toward the Bay of even its current inadequate water, and then adding 2 northern and an ADDITIONALSOUTHERN PUMPING STATION which also would have screens which impinge species –while some of the critters will get through the screen to become entrained within the tunnel if that boondoggle is eventually built and completed.

542	Bruce Campbell	IN THE FORTHCOMING EIR, PLEASE DETAIL THE HISTORY ABOUT HOW THERE WAS AN EVOLUTION FROM "REPLACING" A TLEAST ONE CURRENT SOUTH DELTA PUMPING PLANT THAT WAS DAMAGING SPECIES – to simply "AUGMENTING" the current pumping infrastructure by constructing yet another Southern Delta pumping station. This would be in addition to the diversion areas further north which would send water toward the Southern Delta pumping facility while depriving the San Francisco Bay Area of even the reduced flow it currently gets due to so many Sacramento River and Delta watershed water diversions. If there will be efforts to minimize damage to some species from water intakes relating to the DCP (near whichever new water diversion points proposed under the DCP) by turning off certain pumps at certain times, please give details in the DEIR as to how such decisions will be made.
542	Bruce Campbell	Maps in the EIR need to identify what DWR and other agencies may know in regards to current hazardous materials in the general DCP area which would certainly be impacted by major digging, dredging, and construction activities in the area.
542	Bruce Campbell	Besides hopefully not down playing (in the EIR) the use of toxic fluids and other materials by the DCP, please also do not downplay the toxicity of the materials that will be encountered between the ground or delta water surface and 190 feet below that surface. The EIR must detail how the decision would be made to form embankments out of some diggings, place some dug up soil/silt back into some shafts, whether the diggings can be remediated to reduce its toxicity, or whether the diggings are so toxic that they need to be hauled to a Class I toxic dump site.
542	Bruce Campbell	The EIR for the DCP must have their hydrological, biological, and native cultural evaluations work closely together both in regards to the Trinity River watershed, as well as more generally for these evaluations to determine whether you can honestly put a check next to some CEQA Checklist topics.
542	Bruce Campbell	Some things to evaluate in the EIR for the "Statutory Delta Area" would be the cumulative impacts on a range of species (including native and other people, and including the other species "relatives" of native people of California) from: 1. the giant digging/ dredging/ construction project in the Delta area known as the DCP including all of its new intakes, various tunnel reaches, the main tunnel, and lots of associated infrastructure;
542	Bruce Campbell	Some things to evaluate in the EIR for the "Statutory Delta Area" would be the cumulative impacts on a range of species (including native and other people, and including the other species "relatives" of native people of California) from: 2. diverting Sacramento River freshwater away from many of its natural outflow areas allowing the area to become more stagnant, less flushed, and more prone to Harmful Algae Blooms and mosquito larvae which have yet other repercussions as a result of the DCP;
542	Bruce Campbell	Some things to evaluate in the EIR for the "Statutory Delta Area" would be the cumulative impacts on a range of species (including native and other people, and including the other species "relatives" of native people of California) from: 3. the basic operation of the major infrastructure if it is finally completed. During such operation, rather than the earlier proposal to "replace" a pumping station in the South Delta due to supposed concern about impingement and entrainment of species at such facilities, unfortunately the DCP calls for an "augmented" / additional pumping station instead of the replacement.

552	Nicole Suard Snug Harbor Resorts	Of course, you will have received comments regarding impacts to salmon, impacts to terrestrial environment, impacts on the lives of the residents, agriculture, wineries, entertainment venues and housing clusters in the Delta. I will be watching and hoping that DWR will adequately address all impacts to the Delta area and Sacramento River Watershed, which would likely lead to the conclusion that there have been excessive diversions from the Delta for at least15 years.
561	Diane Riddle State Water Resources Control Board	A lengthy construction schedule for the Delta Conveyance Project could have a prolonged effect on nearby residents, communities, public services, classrooms, marinas, fishing, boating, recreation, tourism and businesses including noise, traffic, economic, and aesthetic impacts. The EIR should fully evaluate all construction-related impacts, including impacts to terrestrial and aquatic species during construction, and propose detailed avoidance, minimization, or mitigation measures for potential impacts.
561	Diane Riddle State Water Resources Control Board	The EIR should analyze the cumulative impacts of the Project and current and probable future projects including current and potential future water storage and diversion facilities north and south of the Delta (e.g., Sites, Del Puerto Canyon, Pacheco reservoirs, etc.); changes in the regulatory environment (e.g., the update to the Bay-Delta Plan, Federal Energy Regulatory Commission relicensing projects, etc.); implementation of the Sustainable Groundwater Management Act; and activities identified in the Water Resiliency Portfolio.
564	Elsa Rose	Please consider how the project will impact residents in Discovery Bay, and along the Byron Tract Maintenance shaft.
566	Marie Grant	Examine the rules and regulations for reporting and studying the potential effects on the San Francisco Bay and Delta.
566	Marie Grant	Examine and report on probably effects on people who can only flourish with adequate water.
568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	Previous DWR modeling and analysis done for the WaterFix project revealed a number of inadequacies associated with that effort. The modeling for the Delta Conveyance should not repeat those problems. The inadequacies include, (a) averaging model results, (b) failure to analyze actual impacts associated with model outputs, (c) failure to predict how modeling outputs will affect actual water quality and (d) not using up-to-date channel geometry in the models. All of these issues can be avoided. Failure to correct these problems will necessarily mean the eventual EIR/S will not contain the best science available.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	AVERAGING OF MODELING RESULTS IN INAPPROPRIATE In the WaterFix environmental documents as well as the evidence presented by DWR and USBR during the Water Fix hearing before the State Water Resources Control Board, DWR modeled (among other things) a "with project" and a "without project" and then compared the two results. Instead of comparing the specific modeling outputs, DWR averaged monthly outputs for each of the years modeled and then compared similar averaging from the other scenario. DWR's analysis modeled thirteen years, then averaged all the data for each month, and then compared the two scenarios' monthly averaged results. Whether such averaging of model outputs is ever appropriate, it is especially inappropriate when trying to estimate a project's impacts on water quality in the Delta. Per the testimony given by SDWA's expert witness Tom Burke, PE., at the Water Fix hearings, the averaging of thirteen years of model outputs smooths out the extremes in the outputs such that large and persistent changes in the outputs do not appear. Thus if the model estimates a large decrease in salinity in one month of one year, but also a small decrease or small increase in another year for the same month, the average of those numbers ends up hiding the large increase. [Attached hereto are all documents referenced in these comments.] DWR's averaged outputs showed small or little changes between the two scenarios. However, Mr. Burke, using DWR's model outputs presented the complete data for each month of each year without using averaged data. The differences between his presentation and that of DWR's was marked. Instead of there being little or no difference between the with and without project scenarios as presented by DWR, there suddenly appeared to be multi month-long timeframes of significant changes in salinity under the with project scenario as compared to the without project. This clearly showed that while DWR concluded there were only small or insignificant changes in salinity due to the project, in actual fact, their model outputs showed significant changes in salinity. The averaging of the data hides the real model outputs and prevents the public from seeing the actual (estimated) impacts of the proposed project. DWR argued that its model (specifically DSM2) should not be used to look at or analyze short periods of time and so the averaging is necessary. That assertion is false for a number of reasons, the first of which leads to the second modeling error.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	DWR MODELING ANALYSIS DOES NOT ACTUALLY EXAMINE IMPACTS. In the WaterFix hearing DWR used its averaged model outputs and compared them to the various water quality standards in the Delta. With regard to salinity changes estimated to occur in the areas where the southern Delta salinity standards apply, DWR concluded that the estimated changes in salinity, being so small, would not cause any violations of the standards. In addition, DWR and USBR claimed to operated their projects such that all Delta standards would be met. Leaving the latter until later herein, the former is irrelevant. Per the uncontroverted testimony of Terry Prichard and Dr. Michelle Leinfelder-Miles given at the WaterFix hearings, comparing changes in the salinity of the water in the Delta channels is only the first part of an analysis to determine if any such changes cause adverse impacts (and the degree of impacts) to agricultural crops. Although the SWRCB has adopted specific water quality standards to protect southern Delta agricultural beneficial uses (measured by "electro-conductivity or "EC"), those standards are of course not the only or even the best way to measure specific impacts of a proposed project. The SWRCB process to develop standards purportedly looks at what is needed to protect the subject beneficial and not to prevent all harm to that use. In addition, the process considers other factors which might result in a less protective standard from being adopted. The water quality standards are not a scientific determination of a threshold below which no damage occurs and above which damage does occur. They are instead are a regulatory mandate to provide some level of protection to beneficial uses. CEQA requires an examination of effects and impacts, not just a comparison of impacts to standards. Per Mr. Prichard, and Dr. Leinfelder-Miles, the accepted science dealing with how salinity might affect agricultural crops is an examination of average seasonal (or yearly) soil salinity; impacts are not determined by examining averaged changes in the applied water salinity(in this case the Delta channel salinity). The correct analysis was not done by DWR or USBR in their various analyses in the WaterFix documents or in their evidence and testimony presented at the hearings. The accepted science has developed crop specific soil salinity thresholds which if exceeded will impair or result in harm to the plant/crop. The laboratory experiments from which these thresholds are derived look at how a certain amount of applied water of a certain salinity will allow the salts in the soil to adequately leach or if the salts will accumulate to the point where they exceed the threshold (beyond which crop damage occurs). The salinity of the applied water can be used to roughly estimate if salts accumulate in the soil (to the point where damage to the crop occurs) but only if the actual soil (being farmed) is similar to the conditions in the laboratory. The laboratory typically uses sand for the test while southern Delta soils are a mix of many types, some being massive. The more massive soils do not allow water to pass though very easily and thus any laboratory results based on sandy soils may be irrelevant to the real conditions in the southern Delta. Thus, when DWR's modeling indicates any particular increase in salinity under the with project scenario, they must then determine how this increase affects the soil salinity in the subject farmland soils or their analysis is incomplete. Because DWR failed to do this last and most significant step, its conclusions are meaningless. Here, DWR needs to determine how modeled changes in channel water salinity might affect farmland soil salinity. A complete scientific analysis would need to determine if a 100 EC increase in applied water salinity will affect the soil salinity of the lands that use that water. Dr. Leinfelder-Miles also presented evidence of a soil salinity study she conducted which showed how certain areas within the southern Delta were not adequately leaching and thus the soil salinity was increasing, even when the applied water salinity did not exceed the standard. If the project causes an increase in applied water salinity

	which increases soil salinity that impact needs to be identified and quantified. That impact is entirely independent of how a change in Delta water quality compares to a standard. Mr. Prichard and Dr. Lenifelder-Miles also testified that in addition to the effects of increased soil salinity during the growing season, high salinity in the applied water at a particular time could itself inhibit and/or damage certain seedling crops, even if the seasonal soil salinity was below the threshold. Because of this, each month's modeling data (not averaged data) is important in estimating if crop damage is expected to occur. By using the averaged data, DWR ignored any method of estimating how short term changes in salinity may or may not cause harm. When DWR concluded that (again for example) a 100 EC increase does not result in a violation of the standard therefore the 100 EC change will not result in any adverse impacts to farmers, that conclusion was demonstratively false. If the 100 EC increase is within the area for which inadequate leaching is occurring and salts are already accumulating in the soil, the 100 EC increase will necessarily be compounding the salt problem and likely causing damage. [Although increased salt in the soil is in and of itself a damage, the yield from any crop in any particular year depends on many factors.] Unless DWR examines how and change in EC actually affects the soil salinity in lands which use the channel water (worsened by their project), they are not using the best available science but are using only part of the science.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	DWR'S MODELING DOES NOT IDENTIFY ACTUAL CHANGES IN WATERQUALITY Previous DWR modeling efforts typically assert that the DSM2 model does not predict actual conditions, rather it is used to compare different scenarios in order to estimate the effects of a proposed project. Although this may be generally true in some cases, it is not true in all cases and it reveals another fault in the environmental analysis being done. DWR's assertion in the WaterFix analysis was that the with project scenario (using averages of model impacts) did not result in any exceedances of the southern Delta salinity standards. However, if the modeling can only be used in a comparative analysis, and not to estimate actual water quality resulting from the project, then one cannot make any conclusions about the project's effects on the beneficial users of Delta water. DWR's logic is that it cannot predict actual conditions but can only show a change in conditions. No conclusions can be drawn as to the effects of a project unless the change in conditions is somehow applied to the real world. If for example the model shows that the increase in salinity is only 50 EC, how can one determine if that amount of increase results in an exceedance of the standard or not? A 50 EC increase over an "existing" EC of 100 may not result in an exceedance of the 700 (or 1000) EC standard. However, if the 50 EC increase occurs when the "existing" water quality is 680 EC, then the 50 EC increase will indeed cause an exceedance. Recall, such exceedances are the criteria DWR used in the WaterFix hearing to make conclusions about harm or damage. As above, the question is actually not how a change affects the meeting of a standard, rather the question is how a change affects a water user. If the 50 EC increase results in the season's average soil salinity exceeding the threshold for that crop, then it is certainly an adverse impact caused by the proposed project. DWR's logic falls apart unless the model outputs can actually be applied to real circumstances regardless of whether an impact is measured by exceedance of a standard or the effect on soil salinity. In fact DWR does use the DSM2 model to predict actual water quality. As presented at the WaterFix hearings, DWR performs modeling during times of Joint Point of Diversion("POD") in order to comply with its permit conditions for that type of operations. Their modeling estimates whether or not the POD will adversely affect water quality or stage. Again, predicting a change without comparing how that change relates to existing water quality or stage would be useless. Because it is supposed to estimate if the POD will cause harm to water quality or stage, DWR also includes in its POD modeling results the actual water quality and stage. Thus, one can look at the modeling which (for example) shows a 100 EC change and then look at the actual EC to estimate how that change relates to actual conditions. This is what DWR must do for the subject CEQA analysis. Modeled outputs must be compared to the actual conditions for the years modeled. In that way the public can see if any increase in salinity is occurring at a time when water quality is already bad and see just how accurate the model is at predicting actual conditions. It is interesting to note that per those POD modeling results, the DSM2 model sometimes accurately tracks actual water quality but regularly misrepresents actual water quality. Because the model is not always accurately predicting actual water quality, we confirm that only showing modeled differences between two scenarios yields no useful information. If one cannot match a modeled change in EC to what the actual EC will be, one can never determine if the change is causing impacts. Thus any analysis by DWR which does not match estimated changes in water quality to actual conditions is not an adequate analysis and certainly not the best available science. This leads us to the next problem with DWR modeling.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	DWR'S MODEL DOES CONTAIN ACCURATE, UP TO DATE INFORMATION As described above, the DSM2 model does not always accurately predict actual water quality conditions in the southern Delta channels. SDWA testimony and evidence presented at the WaterFix hearings showed that DSM2 has as its inputs for channel geometry, data which is at least 5 years old and some that is over 20 years old. Since that data was accumulated, siltation has occurred in the southern Delta channels which has significantly altered channel geometry. SDWA performed channel soundings to determine what the actual channel geometry was in various areas. That new data revealed the inaccuracy of the DWR/DSM2 data. As an example, near the Undine Road bridge over Middle River, the DSM2 model "thought" the channel had 10 feet of depth at a certain tide when the up-to-data SDWA data showed one foot or less of depth. This difference makes the DSM2 model outputs unreliable. The model uses data input (e.g. flow, ambient temperature, etc.) and then performs calculations to estimate how a certain volume of water moving through a channel will change over time. The calculations then "predict" characteristics of the water such as temperature, water quality, stage, rate of flow, volume, etc. If the channel geometry is (for example) now one-tenth of what the model "thinks" that means less water is actually moving through the channel and thus the calculations are necessarily completely wrong. Less water might mean less salt from one direction (Delta tidal flows go back and forth in the channels) or less dilution from another direction. Less water means less tidal flow, less water getting to certain places, a greater susceptibility to temperature changes, and on and on. Without updated channel geometry, the DSM2 model cannot be considered the best available science. [SDWA has provided DWR its more current channel geometry data and has itself performed additional channel surveys. However, SDWA is informed that an "updated" DSM2 (including updated channel geometry) might be available by 2020, but that even then it would not contain any channel geometry data later than 2015 in it.]

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	THE PROPOSED PROJECT IGNORES THE LEGAL MANDATES REQUIRING THAT EXPORTS BE LIMITED TO WATER WHICH IS TRULY SURPLUS TO THEPRESENT AND FUTURE NEEDS OF THE DELTA AND OTHER AREAS OF ORIGININCLUDING FISH AND WILDLIFE NEEDS Any analysis of increased or changed exports by DWR or USBR must first begin with a water availability analysis. Prior environmental reviews by the projects simply assume there is water to export and intentionally avoid any water availability analysis. This practice should not continue. Per various statutes, case law and regulatory mandates, DWR and USBR can only export water that is surplus to other needs. The Weber Foundation Studies conducted in anticipation of the S.P., indicated that the average annual amount of water produced (precipitation) in the Sacramento-San Joaquin watersheds during the 1928-1934 drought was 17,631,000 acre feet. During that same period, "Local Requirements" of the beneficial uses in those watersheds was25,690,000 acre feet. Thus, on average during such a drought, the watersheds were short8,059,000 acre feet each year. Although this suggests there is zero water available for exports during droughts, it is of course possible that the inadequate supply comes in spurts which might allow for some exports of "surplus flow" from the Delta. However, that analysis is not the end of the issue. The Weber Foundation Studies did not include what is now known about the adverse effects of the projects on fisheries or the amounts of water needed to preserve the dwindling fish populations. Thus the "Local Requirements" aspect of the Weber Foundation Studies needs updating to likely include even more water; further decreasing the amounts if any that could be exported. Water that the projects may have stored during such droughts may not provide any supply during such droughts. During the last drought, DWR and USBR needed eight Urgency Change petitions (all granted by the SWRCB!) in one year because they had insufficient water in storage to meet their permit and other regulator obligations. Thus any calculation of amounts available for export during droughts should include full compliance with permit terms and regulatory mandates. That stored water is in large part needed to meet those obligations and is thus unavailable for export. When even stored water is insufficient to meet all such obligations, then the projects are obligated to manage whatever supply they do control to meet such standards. For example, current DWR and USBR permits apply and bind not only upstream (of the Delta)reservoirs but also the downstream reservoir San Luis. Thus the "stored" water in San Luis cannot be used unless in-Delta permit conditions are met. This means that water already exported and located in San Luis would need to be released back into the San Joaquin River to protect Delta superior needs including fish and wildlife. Importantly for in-Delta beneficial users, is the case law which conditions exports on meeting in-Delta needs. In the Racinelli Decision (US v. SWRCB 182 Cal. App. 3d. 82 (1986))the court found that The Delta Protection Act (Water Code Sections 12200-12220) "prohibits project exports from the Delta of water necessary to provide water to which Delta users are 'entitled' and water which is needed for salinity control and an adequate supply for Delta users." (at 139.) This case clearly places three in-Delta needs above exports, precluding exports until all such needs are met. Those three needs are 1) water to which Delta users are entitled, 2) water for salinity control, and 3) an adequate supply for Delta users. As DWR well knows, in the last drought the SWRCB attempted to curtail numerous in-Delta water users who claim pre-1914 and riparian rights while still allowing exports. Per the Racinelli there can be no exports if a full and complete in-Delta supply is not provided. Thus, any analysis of the proposed project must be based on a water availability analysis that conforms to the law.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	The Delta Reform Act Water Code section 85031(a) provides:"(a) This division does not diminish, impair, or otherwise affect in any manner whatsoever any area of origin, watershed of origin, county of origin, or any other water rights protections, including, but not limited to, rights to water appropriated prior to December 19, 1914, provided under the law. This division does not limit or otherwise affect the application of Article 1.7 (commencing with Section 1215) of Chapter 1 of Part 2 of Division 2, Sections 10505, 10505.5,11128, 11460, 11461, 11462, and 11463, and Sections 12200 to 12220, inclusive." (Emphasis added.) Water Code Sections 11460 et seq. and 12200 et seq. are specific in defining the limitation on the export of water from the Delta by the S.P. and CVP. Water Code Sections11460 et seq. were added by Statutes 1943, c. 370, p. 1896 around the time of commencement of the CVP. Water Code Section 12200 et seq. was added by Statutes 1959, c. 1766, p. 1766 around the time of commencement of the State Water Project. The limitation of the projects to the export of only surplus water and the obligation of the projects to provide salinity control and assure an adequate water supply sufficient to maintain and expand agriculture, industry, urban, and recreational development in the Delta is clear. Water Code Sections 12200 through 12205 (as examined in the Racinelli Decision) are also specific as to the requirements to provide salinity control for the Delta and provide an adequate water supply in the Delta sufficient to maintain and expand agriculture, industry, urban and recreational development.
568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	The cumulative impacts of the proposed project together with the predetermined single tunnel will clearly render water supply less reliable in all areas of the Delta downstream of the Sacramento River intakes and those areas along the current routes of Sacramento River flow to the export pumps. The common pool for the interior Delta will be eliminated along with the common interest in protecting the water quality. The single tunnel has no outlets and requirements to protect water quality in dry periods are always circumvented. For areas throughout the watershed, including those along the tributaries upstream of the Delta, curtailment of local water use, and water transfers to increase utilization of the highly expensive tunnel combined with the need for fish flows and high water consumption habitat to mitigate for the construction and operation of the tunnel will greatly add to unreliability.
568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	OTHER REASONABLE ALTERNATIVES MUST BE CONSIDERED. The NOP suggest a very limited set of alternatives. Such limitations are contrary to CEQA and contrary to the public interest. Alternatives that should be considered include an armored pathway through the Delta which allow prompt restoration of legal exports after a catastrophic earthquake event; alternate routes for any tunnel which avoid use of the already insufficient Delta roads, highways and waterways; a decrease in exports with other sources to supplement export needs; the San Joaquin Valley Blueprint suggested under channel diversion points; and the Delta Corridors proposal. All such alternatives should include actions to fully mitigate the CVP and SWP's adverse impacts on the San Joaquin River and the southern and central Delta waters.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Second, in order to be consistent with the Delta Reform Act the DEIR must consider one or more alternatives that include new conveyance as part of a portfolio of local and regional water supply investments. The 2013 Portfolio Alternative for the Delta provides one model for this approach, and the terms and conditions proposed by NRDC et al in our opening statement to the SWRCB for the WaterFix change in point of diversion hearing provides another portfolio alternative that should be considered. The CALFED EIR/EIS provides another potential model for analyzing Delta conveyance as part of a broader program; that final EIR analyzed the effects of the CALFED program, including program elements such as habitat restoration, water conservation, new Delta conveyance, water quality improvements, and improved flows and fish screens to protect fish and wildlife. Similarly, here CEQA analysis of a single tunnel Delta conveyance project as part of a portfolio that reduces reliance on the Delta and invests in local and regional water supply projects could utilize both programmatic and project level analysis of different program elements.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	CEQA requires that the DEIR analyze the effects of the whole project on the environment. CEQA Guidelines § 15378 (definition of "project" means "the whole of an action"). The definition of a project is broadly construed in order to maximize protection of the environment. Nelson v. County of Kern, 190 Cal.App.4th 252, 271 (2010). The whole of the action analyzed in this DEIR must include upstream operations of the SWP and CVP, and it must consider not only short-term effects of construction and operations, but also effects of operations in the long term in light of the likely effects of climate change.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	While there is language in the NOP suggesting that the DEIR will consider upstream effects, other language in the NOP suggests that the DEIR will not fully consider effects from operations of the SWP and CVP upstream of the Delta. The NOP acknowledges on page 6 that the scope of the environmental review may include State Water Project contract amendments relating to paying for Delta conveyance, and that the geographic scope includes areas upstream of the Delta. In contrast, the NOP on page 9 suggests that the DEIR will only examine changes in flow in the Delta and exclude consideration of changes to flow and water temperature upstream. Moreover, DWR's recent DEIR for operations of the State Water Project failed to adequately consider environmental impacts from operations of the CVP and SWP upstream of the Delta, raising further concerns about the language in this NOP. As discussed in more detail in our comments on that DEIR, because the State Water Project and Central Valley Project are operated as a coordinated system, and because operations in the Delta affect operations upstream, the DEIR must consider effects of SWP and CVP operations throughout the Bay-Delta watershed, including effects in the Feather River below Oroville Dam and in the Sacramento River below Shasta Dam.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Second, although the NOP does not identify the temporal duration or extent of environmental analysis, it is essential that the DEIR consider both short-term and long-term effects of the proposed project and alternatives. Short-term effects would include effects of more than ten years of construction and the subsequent operation of the project; long-term effects would include operations, including the effects of climate change, decades from now. Long-term effects must be considered because: (1) the SWP, including Delta conveyance, is intended to be operated for decades; (2) SWP contractors would likely be paying for the project for decades; and, (3) because the California Endangered Species Act requires that the State Water Project fully mitigate impacts in light of the effects of climate change, regardless of whether and to what extent SWP operations contributed to climate change. Environmental Protection Information Agency v. Calif. Dep't. of Forestry and Fire Protection, 44 Cal 4th 459, 513 (2008). The DEIR must therefore consider the effects of operations of the SWP in light of the effects of climate change over a time period that extends at least until 2070.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Pages 10-11 of the NOP inaccurately describes the BDCP/WaterFix EIS/EIR process, because it fails to acknowledge that DWR withdrew its Notice of Determination and withdrew certification of the final EIR. See DWR, Rescission of Notice of Determination (NOD) – State Clearinghouse Number – 2008032062, May 2, 2019.5 The NOP properly acknowledges that the "proposed Delta Conveyance Project is a new project and is not supplemental to these past efforts or tiered from previous environmental compliance documents." (emphasis added). DWR must ensure that the DEIR does not tier to the fundamentally flawed final EIR for the BDCP/WaterFix project.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	In order to accurately assess potentially significant impacts, the DEIR must use credible methods of analysis, such as the Winter-Run Life Cycle Model, and cannot use statistically improper methods, such as the statistical manipulation that DWR used to analyze impacts to longfin smelt from reduced Delta outflow in its recent DEIR for Operations of the State Water Project. Moreover, to accurately assess the impacts of the proposed project and alternatives in light of climate change, DWR should use CALSIM 3 or another model that uses CMIP5 projections of climate change, given that NMFS and other agencies have concluded that CMIP3 projections are not the best available science and underestimate the likely adverse effects of climate change on hydrology and water temperatures. As noted above, the analysis of impacts must only rely on protective operations and mitigation measures that are reasonably certain to occur. Any impact that results in reduction in survival or abundance of species listed under CESA is a significant impact for which mitigation is required, as we noted in our January 6, 2020 comments to DWR: Given the imperiled status of these species, the further reductions in abundance and survival caused by the proposed project constitute mandatory findings of significant impacts under CEQA. The populations of Delta smelt, Longfin smelt, winter-run Chinook salmon, and spring-run Chinook salmon already are not self-sustaining (particularly without hatchery supplementation of salmonids) and are declining in abundance, and the proposed project would further "cause a fish or wildlife population to drop below self-sustaining levels." Cal. Code Regs., tit. 14, § 15065(a)(1)

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	Finally, in its recent DEIR on the operations of the State Water Project, DWR has admitted that with respect to the adverse effects on fish and wildlife caused by operations of the State Water Project, together with similar effects caused by the CVP, other dams and water diversions in the Bay-Delta watershed, and habitat modifications in the watershed, "This overall cumulative impact is significant." In light of the acknowledged significant and adverse cumulative impacts, and the State Water Projects' disproportionately large proportion of those effects (including the State Water Project's settlement contractors on the Feather River and implementation of the Coordinated Operating Agreement with the CVP), the DEIR must carefully consider the cumulative impacts of the proposed project, particularly in light of pending proposals for Sites Reservoir and other water storage and diversion projects. Given that CALSIM modeling of Sites Reservoir and other reasonably foreseeable projects is available, the DEIR's analysis of cumulative impacts should include quantitative analysis and not simply rely on qualitative analysis.
571	Karen Jacques	The EIR should analyze construction and maintenance impacts including analysis of all materials used in construction for both the tunnels themselves and any reservoirs constructed or enlarged as part of the tunnel project.
572	Katja Irvin	In the regulatory setting, please discuss the relationship of the Project to the following State regulations that aim to improve our environment and how the Project will contribute to meeting the goals and requirements of these regulations: The California Air Resources Board targets under AB 398 to reduce GHG emission to 40% below1990 levels by 2030 and 80% below 1990 levels by 2050. Electricity accounts for 15% of GHG emissions in California and, according to the California Public Utilities Commission, 19% of California's electric energy is used for the conveyance and delivery of water.
572	Katja Irvin	In the regulatory setting, please discuss the relationship of the Project to the following State regulations that aim to improve our environment and how the Project will contribute to meeting the goals and requirements of these regulations: The Delta Reform Act of 2009 (California Water Code Section 85021) policy to "reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency." SWP contractors are counting on the Delta Conveyance so they do not have to reduce their reliance on the Delta. Santa Clara Valley Water District's (SCVWD) recently completed Water Supply Master Plan 2040 shows SCVWD is planning on increasing the percentage of delta-conveyed supplies from 40% to 41% of supplies with demand increasing by 50,000 acre/feet per month. Please quantify and consolidate such data for all SWP contractors to show how the Project supports this Delta Reform Act policy.
572	Katja Irvin	In the regulatory setting, please discuss the relationship of the Project to the following State regulations that aim to improve our environment and how the Project will contribute to meeting the goals and requirements of these regulations: Discuss how the project relates to the Water Quality Control Plan for the San Francisco Bay/Sacramento–San Joaquin Delta Estuary (Bay-Delta Plan), especially fresh-water flow requirements to improve water quality, reduce salinity, and save endangered species from extinction. Since voluntary agreements have not been approved, analysis needs to be based on the requirements adopted by the State Water Resources Control Board (SWRCB).

572	Katja Irvin	Many other projects underway will combine with the Project to impact flows into and through the Delta and/or exports to south-of-Delta contractors. Please analyze the cumulative impacts of the following projects in conjunction with the Delta Conveyance and provide mitigation measures as appropriate. Proposed surface storage projects under development: Shasta Dam and Reservoir Enlargement Project Sites Reservoir Los Vaqueros Reservoir Expansion Project Del Puerto Canyon Reservoir Project Pacheco Reservoir Expansion Project Temperance Flat Reservoir Project B.F. Sisk Dam Safety of Dams Modification Project Other proposed conveyance infrastructure: San Joaquin Valley Blueprint Project Mid-Valley Canal - South Branch 3,000 Mid-Valley Canal - North Branch 1,000 Trans-Valley Conveyance 3,000 Enlarge Delta Mendota Canal Groundwater Recharge Facilities (100,000 ac) 12,000 cfs
577	Alexa Kerr	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
578	Jacob Foley	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
579	Genesis Mendoza	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
580	Diana Garcia	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
581	Rachel Huang	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
583	Lorenzo Castaneda	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
584	Georgia Steinheimer	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).

585	Phoebe Lawton	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
586	Miranda O'Brien	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
587	Jennifer Martinez	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
588	Siena Hooper	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
589	Elvia Cruz	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
590	Luis	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
591	Cynthia Torres	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
592	Selenia	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
593	Gabriel van Praag	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).

594	Arisbeth Cruz	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
595	Arushi Lakhan-Pao	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
596	Malei Guzman	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
597	Dang Nguyen	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
598	Bill Emlen Solano County	The Solano County General Plan, adopted in 2008, reflects an overall commitment to provide protections for the environment while supporting its diverse land uses and human needs with emphasis on protecting agricultural uses in the Delta region. Due to its extent and duration, the proposed Project would cause significant environmental effects that directly impact the County's ability to sustain the objectives established in the General Plan. As required under CEQA (Guidelines section 15125), any EIR and/or EIS must review the Project for consistency with the County General Plan. It is unclear in the NOP that there is an intent to look at the County's General Plan, in particular Land Use Policies; Agricultural Policies; Resource Policies, including Biological Resources, Marsh and Delta Areas, Scenic Resources, Cultural Resources, Recreational Resources, Water Resources, and Quality; Public and Environmental Health and Safety policies including; Flood Control, Disaster Preparedness, and Climate Change; Economic Development policies, Transportation and Circulation policies; and Public Faculties and Services policies; including Water facilities and Service, Drainage, Fire Protection and Emergency Services, Law Enforcement, andUtilities.
599	Michelle Huang	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
610	Henry Kuechler Reclamation District No. 2060	Analyze the economic, social and health impacts of construction of the project facilities within the Delta. These effects on the human environment must be mitigated to the extent required under controlling law.

612	Warren Bogle Reclamation District 150	Analyze the economic, social and health impacts of construction of the project facilities within the Delta. These effects on the human environment must be mitigated to the extent required under controlling law.
615	Justin Fredrickson California Farm Bureau	To avoid unreasonable impacts to Delta farms, communities, businesses, and residents, the preferred Delta conveyance system should select the least damaging approach practicable, both in construction and operation.
615	Justin Fredrickson California Farm Bureau	Finally, potential levee impacts, seepage, drainage, and flood control impacts are not mentioned among potential major in-Delta impacts, but should be fully analyzed and addressed through any and all feasible mitigation. Potential slumping or shifting of levees and potential increased flood risks with tunneling and impacts of traffic and movement of heavy equipment are impacts that should closely examined as well.
615	Justin Fredrickson California Farm Bureau	Many of the proposed potential impacts, regardless of alignment, involve human impacts for residents, farms, businesses, visitors, residents, workers and communities in the Delta. Traffic and normal movement along narrow levee roads, used to transport crops, state highways, commuter routes in the Delta, would all be profoundly impacted. Drainage and irrigation systems, roads, access points and other agricultural infrastructure would be impacted. Extensive rights of way, easements, land and temporary construction impacts, and entry rights would all require compensation and/or legal authorization, and could involve lengthy process or face broad legal challenges—again highlighting some of the advantages of careful siting or outright avoidance in the selection alternatives, alignments, design features, etc. All of these impacts should be analyzed, planned for, and fully addressed, first, through avoidance whenever possible and, second, through measures to fairly compensate and indemnify or, alternately, to minimize or mitigate unavoidable impacts in all other cases, to the greatest extent possible
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Construction methods must be analyzed, and alternative construction methods must be utilized, as demonstrable mitigation, which will not damage the Residents, each of the Residents and the Clarksburg Community, or any significant part of the Clarksburg Community, in any significant way.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Analyze the significant impact of the Project on the Residents, each of the Residents, and the Clarksburg Community, or any significant part of the Clarksburg Community.

620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Analyze the impacts on the continued and future growth and well-being of the Residents, each of the Residents, and the Clarksburg Community, or any significant part of the Clarksburg Community, including the impacts of any de-population in the Clarksburg Community and/or the North Delta, and on the economies of these areas, as a result of the construction, operations, and management of the Project.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, the pre-construction, construction, operations and maintenance of the Project will have a substantial impact on the views from and personal and business operations, rehabilitation, construction and reuse of the parcels of Residents and each of the Residents.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	State and analyze changes in the Clarksburg Community, each significant part of the Clarksburg Community, the Residents, and each of the Residents caused by the Project, including, without limitation, changes in community cohesion, a reduction of opportunities for maintaining fact-to-face relationships, and disruptions to the functions of Clarksburg Community, each significant part of the Clarksburg Community, and North Delta community organizations and gathering places, such as the 1883 Old Clarksburg Schoolhouse, churches, library, and local businesses.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, the Project will cause a decline in Residents and each of the Residents property values in the Clarksburg Community and the North Delta.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, the Project (including its construction, operation and maintenance) would conflict with the status quo of the Residents, each of the Residents, and the Clarksburg Community, and each significant part of the Clarksburg Community.
627	Nichelle Garcia	The EIR should analyze the cumulative impacts of the Delta tunnels in the context of the new Trump administration Biological Opinions for the Trump Water Plan, the BOR plan to raise Shasta Dam, the long term operations of the State Water Project, and the proposed Sites Reservoir. Would these new projects and rules be used to fill the tunnels?

627	Nichelle Garcia	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: Global climate change impacts; Water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; Biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; Impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and Impacts incurred during construction of the tunnel
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	The DEIR should assess all reaches of source water and determine high flows that are protective of all resources. These same high flows should not solely be used by DWR but only a percentage that is agreeable to affected local communities.
632	Robert Hunter Municipal Water District of Orange County	The governor's draft Water Resilience Portfolio reflects both the need to make progress locally and with Delta infrastructure. Given how 27 million Californians get some or all of their water from the Delta, it is imperative to prepare this vital segment of our statewide water delivery system for the future. As you proceed with the environmental review, we urge you to double the efforts to identify ways to minimize impacts to Delta communities by refining the routing of the project.
632	Robert Hunter Municipal Water District of Orange County	The Delta Conveyance Project and the EIR should not be based on political beliefs but on sound science, engineering and economics.
637	Osha Meserve Local Agencies of the North Delta	Since the project proposed now is basically the same as the CWF project approved by DWR in 2017,1LAND refers DWR to the voluminous and detailed comments submitted by LAND and by this law office on that prior project since 2009. In the course of litigation over the adequacy of the California WaterFix project review and approvals, those comment letters were compiled by DWR counsel and staff into a draft administrative record.2In addition, LAND, alongside numerous other protestants, prepared, presented and defended voluminous evidence in the form of expert and lay testimony, as well as supporting references for the State Water Resources Control Board's ("SWRCB") water rights hearings on the CWF project.3These previously prepared comments and testimony apprise DWR of the reasonably foreseeable environmental and other effects of the project, along with the shortcomings of the prior approaches to review and analysis. LAND suggests that DWR thoroughly review these comments prior to completing the project description and analysis in the draft EIR for the "new "Delta Conveyance Project. Available at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/exhibits/(see especially evidence submitted by Groups 19 and 24).
637	Osha Meserve Local Agencies of the North Delta	The new Draft EIR must actually analyze the fully range of potential effects from operation of the project.

637	Osha Meserve Local Agencies of the North Delta	An EIR must also consider related regulatory regimes when considering project alternatives. (See Guidelines, § 151126.6, subd. (f)(1).) Identifying competing regulatory authorities of other agencies and disclosing how those authorities may impact a project is essential information for an EIR. (See Banning Ranch Conservancy v. City of Newport Beach(2017) 2 Cal.5th 918, 935(Banning Ranch); see Pub. Resources Code, § 21003, subd. (a).)
637	Osha Meserve Local Agencies of the North Delta	DWR must also "make a good faith attempt to analyze project alternatives and mitigation measures in light of applicable [regulatory] requirements" and may not "leav[e] it to other responsible agencies to address related concerns seriatim." (Banning Ranch, supra, 6Cal.5th at 941.)
662	John McManus Golden Gate Salmon Association	The whole of the action analyzed in this DEIR must include upstream operations of the SWP and CVP, and it must consider not only short-term effects of construction and operations, but also effects of operations in the long term in light of the likely effects of climate change.
662	John McManus Golden Gate Salmon Association	While there is language in the NOP suggesting that the DEIR will consider upstream effects, other language in the NOP suggests that the DEIR will not fully consider effects from operations of the SWP and CVP upstream of the Delta. The NOP acknowledges on page 6 that the scope of the environmental review may include State Water Project contract amendments relating to paying for Delta conveyance, and that the geographic scope includes areas upstream of the Delta. In contrast, the NOP on page 9 suggests that the DEIR will only examine changes in flow in the Delta and exclude consideration of changes to flow and water temperature upstream. Moreover, DWR's recent DEIR for operations of the State Water Project failed to adequately consider environmental impacts from operations of the CVP and SWP upstream of the Delta, raising further concerns about the language in this NOP. As discussed in more detail in our comments on that DEIR, because the State Water Project and Central Valley Project are operated as a coordinated system, and because operations in the Delta affect operations upstream, the DEIR must consider effects of SWP and CVP operations throughout the Bay-Delta watershed, including effects in the Feather River below Oroville Dam and in the Sacramento River below Shasta Dam.
662	John McManus Golden Gate Salmon Association	Second, although the NOP does not identify the temporal duration or extent of environmental analysis, it is essential that the DEIR consider both short-term and long-term effects of the proposed project and alternatives. Short-term effects would include effects of more than ten years of construction and the subsequent operation of the project; long-term effects would include operations, including the effects of climate change, decades from now. Long-term effects must be considered because: (1) the SWP, including Delta conveyance, is intended to be operated for decades; (2) SWP contractors would likely be paying for the project for decades; and, (3) because the California Endangered Species Act requires that the State Water Project fully mitigate impacts in light of the effects of climate change, regardless of whether and to what extent SWP operations contributed to climate change. Environmental Protection Information Agency v. Calif. Dep't. of Forestry and Fire Protection, 44 Cal. 4th 459, 513 (2008). The DEIR must therefore consider the effects of operations of the SWP in light of the effects of climate change in a time period well after 2050.

662	John McManus Golden Gate Salmon Association	In order to accurately assess potentially significant impacts, the DEIR must use credible methods of analysis, such as the Winter-Run Life Cycle Model, and cannot use statistically improper methods, such as the statistical manipulation that DWR used to analyze impacts to longfin smelt from reduced Delta outflow in its recent DEIR for Operations of the State Water Project. Moreover, to accurately assess the impacts of the proposed project and alternatives in light of climate change, DWR should use CALSIM 3 or another model that uses CMIP5 projections of climate change, given that NMFS and other agencies have concluded that CMIP3 projections are not the best available science and underestimate the likely adverse effects of climate change on hydrology and water temperatures. As noted above, the analysis of impacts must only rely on protective operations and mitigation measures that are reasonably certain to occur. Any impact that results in reduction in survival or abundance of species listed under CESA is a significant impact for which mitigation is required, as we noted in our January 6, 2020 comments to DWR: Given the imperiled status of these species, the further reductions in abundance and survival caused by the proposed project constitute mandatory findings of significant impacts under CEQA. The populations of Delta smelt, Longfin smelt, winter-run Chinook salmon, and spring-run Chinook salmon already are not self-sustaining (particularly without hatchery supplementation of salmonids) and are declining in abundance, and the proposed project would further "cause a fish or wildlife population to drop below self-sustaining levels." Cal. Code Regs., tit. 14, § 15065(a)(1)
662	John McManus Golden Gate Salmon Association	Finally, in its recent DEIR on the operations of the State Water Project, DWR has admitted that with respect to the adverse effects on fish and wildlife caused by operations of the State Water Project, together with similar effects caused by the CVP, other dams and water diversions in the Bay-Delta watershed, and habitat modifications in the watershed, "This overall cumulative impact is significant." In light of the acknowledged significant and adverse cumulative impacts, and the State Water Projects' disproportionately large proportion of those effects (including the State Water Project's settlement contractors on the Feather River and implementation of the Coordinated Operating Agreement with the CVP), the DEIR must carefully consider the cumulative impacts of the proposed project, particularly in light of pending proposals for Sites Reservoir and other water storage and diversion projects. Given that CALSIM modeling of Sites Reservoir and other reasonably foreseeable projects is available, the DEIR's analysis of cumulative impacts should include quantitative analysis and not simply rely on qualitative analysis.
663	Alison Monroe	Any EIR on any project that proposes to remove water from the delta and send it south must consider the total cumulative environmental impact of further dewatering of the Delta.
674	David Guy Northern California Water Association	As DWR embarks on its environmental review and planning for the Delta Conveyance Project, it should carefully develop criteria for operation of the proposed diversion facility that fully protects water supplies in Northern California, the supporting water rights and contracts, and area of origin protections firmly founded in California law.

674	David Guy Northern California Water Association	In addition, the Delta Reform Act of 2009 states that water rights shall not be impaired or diminished as a result of its provisions, including projects such as the Delta Conveyance Project. To adequately inform the public and decision-makers about the environmental impacts of the proposed project, the draft EIR should provide sufficient information about operations to demonstrate that the proposed project will not impact water rights or contracts, and will not reduce available water supplies, both surface and groundwater, for the economy and environment in the Sacramento River Basin.
675	Terrie Mitchell Sacramento Regional County Sanitation District	CEQA requires that DWR consider alternatives to the Delta Conveyance Project capable of avoiding or substantially lessening its significant impacts. DWR staff have represented in Project scoping meetings that there are no available alternative intake locations due to fish concerns. This is inaccurate and contradicted by information developed in the WaterFix CEQA process. Moreover, such statements suggest that DWR has improperly prejudged the scope of its alternatives analysis for the Draft EIR. Information in the WaterFix EIR Appendix 3F, Intake Location Analyses(pp. 3.F.6 -3.F.8), relying on the Fish Facilities Technical Team (FFTT) report, indicates that there are suitable intake locations farther downstream below Steamboat Slough (identified as intakes 6 and 7), which would reduce the potential for conflicts with and significant impacts to SRWTP operations and have the benefit of being better for salmon. At a minimum, the draft EIR alternatives must include a robust analysis of alternative locations for the intakes that avoid these significant impacts.
675	Terrie Mitchell Sacramento Regional County Sanitation District	Given the potential for significant water quality impacts in the Delta due to the reduction in freshwater flows, and Delta Reform Act mandates, the EIR should also fully evaluate both anon-structural alternative that includes water reclamation, localized desalination and increased capture and storage of localized rainfall in lieu of continued or increased Delta exports.
675	Terrie Mitchell Sacramento Regional County Sanitation District	The Delta Conveyance Project is likely to have significant adverse impacts to Regional San's facilities and operations, as well as impacts to water quality. In addition, the Project could create other impacts by necessitating construction of new public facilities at the SRWTP site that would be required as a result of the Delta Conveyance Project. These conflicts with the SRWTP also make the Project described in the NOP inconsistent with the Delta Plan. Regional San encourages DWR to move the proposed intake locations to an area that would not adversely impact SRWTP operations and to coordinate closely with Regional San as it develops the draft EIR to ensure that impacts to the SRWTP facility operations are accurately and adequately evaluated and mitigated.
677	Jeff McCormack JT McCormack, Inc.	Jeff McCormack Co. has a cherry orchard on Andrus Island, on the main Sacramento River, just downstream from Walnut Grove. We co-manage other ranches between Courtland and Isleton as well. The proposed tunnel would have environmental impacts devastating to all the ranches downriver from the intake points between Courtland and Hood. For instance, water needed for ranches at Sutter Slough, Steamboat Slough, and the main Sacramento River would all be impacted, for competing in the coming drought cycle, for remaining water diverted to Los Angeles and San Joaquin River farmers.
677	Jeff McCormack JT McCormack, Inc.	Your EIR should include a discussion of the impacts of water rights pre-existing those acquired by other groups, the impacts of litigation over those rights delaying construction of the pipeline into the drought cycle looming, and scale the impact projections according to the remaining water volumes expected in the river.

680	Antal Kalik	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: ○ global climate change impacts; ○ water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; ○ biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; ○ impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and ○ Impacts incurred during construction of the tunnel and the reservoirs required for water storage.
683	Jeff McCormack Reclamation District 1002	The EIR should calculate what that would be, where the fill would come from, what that fill would contain in terms of potential contaminants that might run off into surface waters used for agriculture, and the effects of displacing water onto adjacent landowners and their residences.

683	Jeff McCormack Reclamation District 1002	Modelling of past flood flow patterns should be conducted, under both past topographic drainage patterns and projected future patterns. Those patterns should include the proposed actions of both regional and nearby landowners that would contribute to disproportionately extreme flooding as a result of their development of absorptive soils up-watershed in Sacramento County under their Comprehensive Plan amendments, by City of Elk Grove, and by agencies and non-profits in "habitat restoration" that is reported to have an avowed purpose of "re-activating the state's floodplains." Specifically, "up-watershed" is meant here as the Sacramento County plans for developing large tracts of land to the NE of Elk Grove, already moving South from Rancho Cordova, toward a diagonal line to direct development toward Folsom, affecting Morrison Creek, and the Cosumnes River. Morrison Creek feeds into the upper end of Snodgrass Slough, and the increase in development projects up-watershed has resulted in many more square miles of impervious surfaces like rooftops, roads and parking lots over the top of formerly absorptive soils, resulting in increased runoff that had been absorbed through rough cobbles from glacial till pushed out of the Sierras to the West. Those development projects are supposed to have county or municipal permit terms that specify mitigative measures like retention basins to hold the water longer, until groundwater aquifers can absorb it. It is unknown now whether existing standards for calculating the size of required retention basins will be sufficient for projected torrential downpours from warmer climate air masses carrying more water in atmospheric rivers and superstorms. Likewise, Sierra snows are predicted to become more water-laden and melt earlier in the season, for faster and more extreme runoff pulses, followed by longer dry seasons. Mitigation of those projected impacts should also be assessed by DWR, and a plan for delaying those flows for metering more slowly through the growing season, and to prevent flooding. Therefore, your EIR should include modelling that will be structured to take these projected patterns into account. The modelling should be funded at a level that will enable gathering of data from the responsible municipalities and state & federal agencies, including conservancies, using the latest technologies, and link those models together to show the expected rates of runoff under various regime scenarios. The Sierra Conservancy should therefore be synchronized ("sync'd) with the Foothill Conservancy and Delta Conservancy, and the responsible federal and state agencies should be funded at a scale that can do this work properly. We have been requesting this for years. Your proposed project could justify funding for the forecasting and engineering design work, and reclamation district levee expansion could become your first line of defense. That would also protect the rest of the district for remaining acreage in Agriculture and residential.
684	Jeff McCormack John McCormack Co.	John McCormack Co.'s Glannvale Ranch would be affected by the 20 years of construction activity upstream on the headwaters of our reclamation district, which all flows into the canal that drains through our property into Lost Slough.
684	Jeff McCormack John McCormack Co.	Therefore, the environmental impact report should document these complexities, and propose re-design of any project to reduce impacts of environmental projects on existing landowners and residents who are not landowners per se. e.g. Displacement of renters to higher-priced urban quarters, reducing their standard of living.

694	Delta Counties Coalition	The development of a proposed Project and analysis in the Draft EIR should be preceded by a quantitative analysis to inform the sizing of the Delta tunnel and the volume of water it is intended to convey. As the DCC explained in its comments on the January 2020 Draft Water Resiliency Portfolio ("WRP"), Executive Order N-10-19 requires that the three WRP working group agencies "shall first inventory and assess" . . . "[e]xisting demand for water on a statewide and regional basis and available water supply to address this demand." (EO N-10-19, section 2(a).) The NOP notes that DWR has previously studied a similar project through the Bay Delta Conservation Plan ("BDCP") and California WaterFix efforts. However, the NOP states that the proposed Project is a new project and "not supplemental to these past efforts or tiered from previous environmental compliance documents." (NOP, p. 10.) Thus, DCC expects that the Draft EIR Project description and alternatives will be informed by a new quantitative assessment of our state's contemporary water supplies and demands. The technology is available today to better understand and predict river flows and related water data including dam operation efficiency. This information is crucial in calculating how much water is available for consumptive uses. Without quantifying the water needs of people and fish, along with relevant climate change information such as the future loss of snowpack, projections of how much water the system can export and separate from the Delta estuary in the locations proposed by the Project are unsupported and erroneous.
697	Delta Independent Science Board	Although we recognize that the Delta Conveyance Project is a new project that will use new processes and involve a new team, we see an opportunity to learn from previous processes so that this effort can advance in a way that will lend itself to the best scientific review and public and regulatory evaluation. Practices that lend themselves to the best scientific review will also support effective and transparent communication of this information to the public and decision makers. For this reason, we recommend that Delta Conveyance Project managers review the comments we provided in our June 16, 2017,memo, "Delta ISB's Final EIR/EIS Review for California WaterFix." This memo is provided as an attachment to this letter for your consideration.
697	Delta Independent Science Board	Adaptive management–The Delta ISB recommends that adaptive management be considered in all phases of the Delta Conveyance Project, including early phases of project planning. We would be happy to discuss some approaches for doing this.
697	Delta Independent Science Board	Scientific information–We recommend that EIR documents incorporate new findings from recent scientific work throughout the process. Findings from climate-change science, for example, will be evolving throughout the Delta Conveyance Project and it will be critical to stay abreast of new research findings and incorporate these findings as they develop.
697	Delta Independent Science Board	Communication–We recommend clear communication of the principal findings, alternatives, and uncertainties throughout the EIR documents. The Delta ISB recommends use of graphics and informative summaries to ensure that information is understandable to decision-makers and the public. These approaches will increase the readability and credibility of the EIR documents and increase transparency.

697	Delta Independent Science Board	Long-term effects–The EIR documents should consider future uncertainties such as the degree and timing of sea level rise and other aspects of climate change in the analysis of the long-term performance of alternatives. Long-term interactions of California's groundwater and Delta problems also seem important. Because the Delta is a complex and dynamic system, the EIR documents should discuss contingencies when possible. Risk analysis should be included in the process.
697	Delta Independent Science Board	Summary of project impacts on Delta residents and visitors–The impacts of project construction on Delta residents and visitors should be summarized and presented in a coherent and understandable way. This information will be informative to the agencies involved and will facilitate public engagement and scientific advancement.
697	Delta Independent Science Board	Comments on WaterFix Final EIR/EIS to consider in Delta Conveyance EIR: Although the treatment of adaptive management and monitoring in the Final version is improved over earlier drafts, it remains weak on details, particularly in relation to the extensive and detailed coverage of other topics in the Final version. We are assured that an adaptive management and monitoring plan will be developed "during early years of project implementation" (Responses to comments on Draft EIR/EIS 2546-79). As we have noted previously, developing such a plan at the outset is essential if adaptive-management is to be used effectively. A plan and structure for adaptive management and monitoring should be in place before actions are initiated. A compelling case of adaptive management implementation to mitigate environmental impacts of the projects over the long term is lacking. There also remains no mention of potential impediments or constraints on conducting adaptive management; many of these can be anticipated (as discussed in the Delta Plan and the Delta ISB review of adaptive management, Delta ISB, 2016). The organization and use of adaptive management as proposed is closely tied to the Biological Opinions (BiOps) required under the Endangered Species Act(ESA). Given the regulatory context of an EIR/EIS, this is understandable; management of the Delta and its waters is constrained to operate within relevant laws and regulations. Designing the adaptive management and monitoring program more broadly, to consider actions, decisions, and their consequences for the Delta and its inhabitants would be far more valuable. That said, the Final version does describe (briefly) a procedure for considering the application of adaptive management to management changes falling outside the purview of the BiOps and ESA authorizations (section ES.3.2.3, page 3-287).

697	Delta Independent Science Board	Comments on WaterFix Final EIR/EIS to consider in Delta Conveyance EIR: The Final EIR/EIS resembles its predecessors in failing to communicate clearly the principal findings and uncertainties of an enormous report. Two examples: Most decision-makers and members of the public will struggle with jargon in the tabular summaries. These encode each of the alternatives with cryptic names, instead of providing the reader-friendly handles used in section 29.3.2. 2.The Final EIR/EIS, in its responses to comments, downplays the need for improved graphical communication of California WaterFix alternatives and their impact. Reproduced below is an example we provided of the kind of graphic that could provide informative summaries at a glance for comparing alternatives on some major performance objectives (Delta ISB,2014, 2015). In response, the Final EIR/EIS states that the graphic "does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 Draft EIR/EIS that are not already addressed in the Final EIR/EIS." This response, like the Final EIR/EIS itself, completely misses the point about using diagrams, integrated with text, to make the report readily understood by decision-makers and the public. (Note that graphic is included in the 2020 comment letter from the Delta ISB).
697	Delta Independent Science Board	Comments on WaterFix Final EIR/EIS to consider in Delta Conveyance EIR: We recommend field experimentation to restore wetlands, testing alternative methods in space and over time. An adaptive restoration approach can reduce uncertainty and explain why outcomes differ. Chapter 11, p. 246 (of 4,191 pages) lists three reasons why detailed restoration plans are not available: (1) because the habitat restoration and enhancement would occur, if feasible, in areas with willing sellers, none of whom have been identified; (2) to maintain flexibility for adaptive management; and (3) because implementation has a long timeframe. So, for the EIR/EIS, the assessment of the effects for the habitat restoration and enhancement was programmatic and focused on restoration opportunity areas (ROAs) identified in the BDCP. The ROAs are large land areas centered on Suisun Marsh, the West and South Delta areas, Cache Slough and the Cosumnes/Mokelumne area in the east Delta (Figure 3-1 in Chapter 3, Description of Alternatives). Individual project-level environmental review based on more detailed plans will be required for these actions before implementation. Vegetation, particularly native vegetation, is under-represented in discussions of habitat restoration. The term "vegetation" nearly always occurs in reference to invasive plants (e.g., one heading is "Vegetation Removal"). On p. 218 of chapter 11, there is one short note about restoring vegetation: "Restoration would likely include pre-breach management of the restoration site to promote desirable vegetation and elevations within the restoration area and levee maintenance, improvement, or redesign." There is great opportunity for experimentation and adaptive restoration of native vegetation, since restoration of "riparian habitat" is considered a mitigating factor for project impacts. The literature is clear that restoration efforts have significant "recovery debts" even after a decade or more (Moreno-Mateos et al., 2017). Expectations for ecological impacts of construction and operations being temporary with rapid recovery seem overly optimistic.

697	Delta Independent Science Board	Several overarching problems encumber the series of environmental documents that were prepared for the BDCP and California WaterFix. We note these problems below in commentary intended to offer perspectives on the use and communication of science in the Delta. We live in a world where environmental documents often provide more eyestrain than insight. The National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) were enacted nearly 50 years ago with the intent of developing a clear scientific basis for informing decision-makers and the public of the environmental impacts of projects and policy decisions relative to their net economic benefits. To that end, both Acts required analyses and documentation of environmental impacts, along with public hearings to facilitate citizen engagement. Soon after impact analyses were required, however, concerns were raised that adding steps to the decision-making process would delay or halt development—what was described as "paralysis by analysis."3Almost from the beginning, projects were delayed through legal challenges over the adequacy of the environmental analyses. Moreover, the Courts, by often favoring comprehensiveness perhaps at the expense of comprehension, have promoted increasingly detailed documentation. Environmental impact analyses have become longer and increasingly impenetrable, to the point where massive and opaque environmental impact statements deter public comprehension and engagement, scientific evaluation, and the participatory, intentions of both NEPA and CEQA. When the preparation of such lengthy documents is turned over to contractors, the responsible agencies and staff may fail to fully understand the underlying analyses. By becoming detached from the process, agencies may lose the opportunity to learn in ways that would lead to better informed decisions or improved science. Balancing the need for information against the imperative to make timely decisions is always a challenge. Both extremes should be avoided—either assembling too much detailed information before reaching decisions, or making large, irreversible decisions based on inadequate information and analyses. There will always be uncertainty in environmental analyses. The purpose of environmental impact assessment is to assemble relevant information and conduct analyses to assess the anticipated environmental effects of a proposed project so that an informed decision can be made (with public input) as to whether or not the project should proceed as proposed. The challenge of balancing comprehensiveness with comprehension is evident in the EIR/EIS documents for BDCP and California WaterFix. These documents were prepared to support permitting needed to comply with various state and federal regulations and statutes as well as Court orders. The purpose was to identify potential environmental impacts and address how these impacts would be mitigated in accordance with the legal requirements of NEPA, CEQA, and Biological Opinions. We understand this. Yet, as members of the Delta ISB, we are charged to provide oversight of the scientific research, monitoring, and assessment programs that support adaptive management of the Delta and, ultimately, scientifically informed decision processes intended to enhance the Delta ecosystem and ensure water supply reliability while preserving the values of the Delta as an evolving place. These objectives go well beyond a narrow interpretation of the legal mandate of an EIR/EIS, but they are consistent with the underlying intent of these laws. We recommend a separate document be prepared for each project that lays out the critical issues for public and scientific review and presents information for public and scientific analysis in a clear and comprehensible way. This could be informative for the agencies themselves as well as for public engagement and scientific advancement. In our reviews, we were asked to assess the scientific adequacy of over 50,000 pages of BDCP and California WaterFix draft and final reports. We repeatedly

		requested intelligible summaries of chapters and summary evaluation tables to help us—as well as decision-makers and stakeholders—better understand how the information might support thoughtful evaluation of proposed actions and decisions. Most chapter summaries were deferred to the Final California WaterFix EIR/EIS, and most of those provided fall short, as elaborated in persistent concerns above. The absence of coherent and useful summaries in such massive documents, diminishes the value, and perhaps of this important document as a comparative guide to the expected environmental effects of the alternatives considered.
697	Delta Independent Science Board	We also expressed concern that important recent scientific work was not included in the massive compilations. In an instance regarding climate-change science, we were told that the information used in the EIR/EIS was current enough, and that an EIR/EIS kept up to date would "never get finished."4When we asked about information we considered important for rational decision-making, we were frequently told that the law does not require such information and that lead agencies "avoid speculation. "Reasoned speculation, however, can be an important part of science and public policy discussions. This is especially important in a system as complex and dynamic as the Delta, where one meets uncertainty at every turn. Preparation for contingencies emerges from speculations about what might follow from an action; they are the essence of adaptive management. Rather than avoiding speculations, we contend that an impact assessment should clearly identify major contingencies, describe the ideas or observations behind them, and frame them as testable hypotheses as part of the adaptive management process. This is an important tool for establishing reasonable expectations, limiting surprises, and preparing for possible futures. The field of risk analysis offers ample guidance for such problems. Carefully reasoned speculation is a legitimate part of the "best available science" that informs decision-making. These comments should not be taken as criticism of those who have assembled the information, carried out the analyses, and prepared the BDCP and California WaterFix environmental documents. They faced enormous challenges from such a large and complex system. Yet the Delta's problems are so important that project proponents should go far beyond the norm when providing and synthesizing scientific information. Making this material readily comprehensible is fundamental to rational evaluation of potential environmental impacts by policy-makers and the public. Environmental impact assessments for BDCP and California WaterFix have missed opportunities to increase understanding of the Delta as an ecosystem, a water supply, and as a place where people live and work.
698	Steve Lambert Butte County Board of Supervisors	The BDCP/WaterFix called for extracting more water from the northern Sacramento Valley. The BDCP/WaterFix would deplete, and in some instances, draw down upstream reservoirs to dead pool conditions. The result would have created conditions that prevent other water users from obtaining supplies that they are entitled to under contract or water rights. The approach to subvert the area-of-origin statutes is a clear violation of those statutes intended to protect areas of origin, including the protection of northern Sacramento Valley water supplies from injury by export projects.

701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR must consider the significant impacts of the Project – and alternatives to the Project – on relevant resource areas including aquatic and terrestrial resources, water quality, and climate change.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR must take a look at the Project's cumulative impacts, when taken with past, present, and reasonably foreseeable future actions.

701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR must consider and address its duties under the Public Trust Doctrine. Although compliance with CE"A "may assist an agency in complying with its duties under the public trust doctrine .... [,] CEQA review of a project does not necessarily or automatically satisfy the agency's affirmative duties to take the trust into account and protect public trust uses whenever feasible." San Francisco Baykeeper Inc. v. State Lands Com. (2018) 29 Cal.App.5th 562, 57". "[A] public trust use is not any use that may confer a public benefit, but rather a use that facilitates public access, public enjoyment, or public use of trust land." Id. at 570. In formulating the Project and alternatives thereto, DWR must consider its obligations to protect - to the extent feasible - the public trust resources and uses under its jurisdiction. DWR must do more than simply maintain the baseline condition, where feasible. Unlike CEQA, where the impacts of the Project - and the alternatives designed to lessen those impacts - are framed in the context of that baseline condition, the Public Trust Doctrine requires DWR to examine whether its activities will protect public trust uses independently of that condition. Where, as here, decades-long mismanagement of the state's water supply has resulted in stark declines in the populations of delta smelt, long-fin smelt, salmon, and steelhead, among others, DWR must take affirmative action to protect the remaining fish and wildlife populations throughout the waterways of the Project area. These actions include habitat restoration, new or improved fish passage projects, dam removal, increased instream flow requirements, sufficient minimum Delta inflow and outflow requirements, and other protective measures to restore these imperiled fish, including recovery of the McCloud River salmon and the habitat required to accomplish that objective.
702	Frank Toriello We Advocate Through Environmental Review	The NOP repeatedly states that this SWP project will "potentially" involve the CVP, but there is no indication as to how these projects will be evaluated in the EIR.
702	Frank Toriello We Advocate Through Environmental Review	This lack of attention to CVP in the NOP leaves out many stakeholders, and perhaps most importantly misrepresents who will really benefit from the project – a few wealthy "family farmers" (i.e., corporate farmers) via Westlands Water District. Moreover, this smacks of "segmentation" or piecemealing of projects, something that is prohibited by CEQA. Thus the environmental impacts of CVP's proposed raising of the Shasta Dam and operation of the Trinity River Division/Clear Creek Tunnel as well as the proposed SWP Sites Reservoir must be thoroughly integrated into the Delta Conveyance EIR.
702	Frank Toriello We Advocate Through Environmental Review	The EIR must also evaluate the impact of the project to the far northern reaches of California (including Assembly District 1) and all along the Sacramento River and its tributaries as well as the Trinity River watershed. We note that while the water flows in one direction, downhill (except in SWP where water flows to money), the ecology of riparian systems flows IN BOTH DIRECTIONS.
704	Eric Jenks Wilbur-Ellis Company	If a launch site or other Project component near the Twin Cities facility is included in the proposed Project, the EIR should identify and analyze reasonable and feasible launch sites that would not impact the Twin Facilities facility, given the importance of this facility to agricultural resources.

704	Eric Jenks Wilbur-Ellis Company	The EIR should not recommend, and DWR should not approve, a launch site or other Project component adjacent to or that could impact the Twin Cities facility.
704	Eric Jenks Wilbur-Ellis Company	The DCA Site Plans present two possible alignments for the tunnel: a Central Corridor and an Eastern Corridor. The Site Plans for both corridors tentatively show a "Glanville Tract Launch Shaft Site" that is adjacent to and would impact Wilbur-Ellis's Twin Cities facility. See DCA Board Meeting Materials for March 19, 2020, p. 12 (Central Corridor) and p. 37 (Eastern Corridor), available at https://www.dcdca.org/pdf/2020-03-19-DCABoardMeetingPacketVF.pdf.2These maps indicate that W-E's Twin Facilities property may be used as a "Twin Cities Support Site" for Project-related "Deliveries, Employee Parking, Batch Plant, Offices, Segment Storage, RTM Loading."
706	Shelley Ostrowski Westlands Water District	From these past efforts, it is clear that the Proposed Project may impact CVP operations, including operations of the Jones Pumping Plant and San Luis Reservoir and have environmental impacts in the CVP service area. As a result, DWR must: (2) analyze potential effects on the CVP and the areas served by the CVP.
707	Elaine Barut Little Manila Rising	Pollution and Health Impacts of the Project and its Construction 6. How will the tunnel affect nearby residents' quality of life? Who will be impacted the most? What precautions are being considered that prioritize the health of those who already live there? Will it contribute to pollution of the area? Could it cause any kind of contamination of resources, water…? Will construction make noise? 7. How will this affect air quality? We have pollution burden from the crosstown freeway and other pollution sources mobile and stationary. Will this project worsen our air quality in any way? 8. How will this project affect water quality around Stockton? Among other things, we are concerned that added traffic from construction will cause worsening water quality around Stockton. How will the water quality be protected from construction impacts and longer term impacts of the project? 9. Harmful algal blooms are a problem in Stockton. How will this project affect that? 10. What are they doing with the existing pumps that are already there? Is there an opportunity to reuse, repurpose, retrofit, not waste those resources? What will they do to restore the landscape from the impacts from the existing pumps? 11. What sort of materials are going to be used in this project? Will the materials have negative effects on any life (plants, animals, people) around it? Will they release toxins? 12. What are the other dangers of this project to our community? 13. How long is the project going to take before its whole completion?
707	Elaine Barut Little Manila Rising	Levees/Floods 14. How will they protect the safety of the community from floods? 15. Levees are part of this process - how are they going to strengthen or improve the levees. How will this be prioritized? 16. In the case of the unexpected floods, could the tunnel be repurposed for disaster relief/flood draining? 17. What will DWR do to reinforcing already existing waterways and what are their plans to upkeep them?
707	Elaine Barut Little Manila Rising	Supporting Communities Who Experience Negative Impacts 18. What are ways DWR can compensate and help maintain quality of life and sustainability for communities impacted by the final decision? 19. Will initiatives or programs be created to support and compensate communities for potential damage resulting from the project and throughout the construction process? 20. How will DWR deal with the dangers of the project? What can be and will be done to make it a better outcome for everyone?

708	David Mooney Bureau of Reclamation	Reclamation requests the following: an initial plan that describes how DWR would operate the Delta Conveyance Project and comply with Federal Endangered Species Act requirements related to operations;
708	David Mooney Bureau of Reclamation	Reclamation requests the following: a detailed analysis of the effects of the Delta Conveyance Project on the CVP.
710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	DWR's analyses of the prior California WaterFix project did not adequately account for these factors. Our agencies raised all of these issues before the State Water Resources Control Board (SWRCB) in its multi-year hearing on the California WaterFix water-right change petition. In that hearing, many of our agencies and the Water Forum proposed that terms and conditions –called the "modified flow management standard" or "MFMS" –be incorporated into California WaterFix's operating criteria to address those issues. In developing the Project's new modeling and EIR analyses, DWR should carefully consider the expert evidence submitted by the ARWA in that hearing, which will inform DWR of the type of information, assumptions and methodology necessary to properly evaluate the impact identified in these comments. All of this information is available to DWR through June 30, 2020 ontheSWRCB'swebsite.1DWR should contact any of the signatories to this letter if it is unable to locate or access any of this information

710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	The methodology DWR used in the "Proposed Project "modeling for DWR's draft EIR on an incidental take permit for SWP operations should be applied in its EIR for the new Delta-conveyance Project. DWR's draft EIR for the proposed SWP incidental take permit relies on, for that draft EIR's "Proposed Project," CalSim modeling that assumes terms for Folsom Reservoir management and lower American River stream flows that our agencies and the Water Forum have developed with the Bureau of Reclamation. Specifically, that DEIR's Appendix H states, at page H-1-2-4, the following about the assumptions used in the CalSim modeling supporting the DEIR. The commenter provided a table in their comment letter referring to Table 2-1m. Regulatory Standards – Sacramento River Region. It appears, however, that this text contains an error because our review of the DEIR's CalSim modeling files found the "Proposed Project" scenario actually uses a Folsom Reservoir planning minimum value of 275,000 acre-feet at the end of December, rather than the end of September. As many of our agencies commented on the draft ITP EIR, its Appendix H's text should be corrected to show the use of an end of December Folsom Reservoir storage planning minimum. DWR's EIR for the revised Delta-conveyance Project should use the same end of December Folsom Reservoir planning minimum, paired with the American River flow management standard identified in the "Proposed Project" scenario in the draft ITP EIR. We strongly recommend that these elements from the draft ITP EIR's modeling be stated explicitly as part of the project description for DWR's revised Delta-conveyance project in the EIR to be developed under DWR's November 2019 notice of preparation.
710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	Also, to accurately reflect Project impacts on the reservoir and the American River, the EIR's hydrologic model assumptions must reflect all potential SWP and CVP operations with a proposed Delta tunnel in place. For example, the "San Luis rule curve" that, in the CalSim model, seeks to reflect SWP/CVP operational discretion in moving water from upstream of the Delta into storage in San Luis Reservoir must be at least as aggressive in the with-Project modeling as in the no-Project modeling. DWR's modeling for the California WaterFix project assumed a less aggressive San Luis rule curve with the project, which may have skewed the modeling of that project's potential effects on upstream storage in Folsom Reservoir so that the "with project" modeling showed better storage in the reservoir than actually was likely to occur.

710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	Finally, DWR's environmental analysis of the Project must not rely on the assumption that "real-time operations" are capable of clearly avoiding significant impacts to Folsom Reservoir and the lower American River that could occur particularly in dry or critical water years. During the 2012-2016 drought, real experience showed that "real-time operations" could result in impacts on the reservoir and the river's resources because of other SWP/CVP operational priorities.
714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The EIR should analyze the cumulative impacts of the Delta tunnel in relation to the new Trump administration Biological Opinions for the Trump Water Plan, the Bureau of Reclamation's plan to raise Shasta Dam, the long term operations of the State Water Project, and the proposed Sites Reservoir.
715	Daniel Wilson Reclamation District 3	Analyze the economic, social and health impacts of construction of the project facilities within the Delta. These effects on the human environment must be mitigated to the extent required under controlling law.
721	Michael McDowell	I request that the EIR include an economic analysis of the construction and engineering payroll for this project and which economy those workers' dollars will really go and including the lead engineer's, based on the current companies already identified or hired as the possible construction company and engineering firm to be used.
721	Michael McDowell Double M Farms	I request the EIR address all hazards and impacts associated with the surrounding gas fields.
721	Michael McDowell Double M Farms	I request the EIR to look into the timeline and costs for mitigating if a mega-earthquake occurs which will damage the tunnel.
721	Michael McDowell Double M Farms	The EIR needs to address that the project is properly designed and built without shortcuts financially, safety, or the necessary materials.

721	Michael McDowell Double M Farms	The EIR needs to address the costs to properly remove and dispose of all tunnel muck brought up to the surface.
721	Michael McDowell Double M Farms	I request that the EIR address and mitigate for the financial loss of agricultural production at each of these sites.
721	Michael McDowell Double M Farms	The state cannot ignore the Delta residents and the ecosystem with this project. All of these impacts need to be addressed by the state and have money available to mitigate any impacts from this project to all Delta families.
726	Roger Cornwell Sacramento River Settlement Contractors	As DWR embarks on its environmental review and planning for the Delta Conveyance Project, it must carefully develop criteria for operation of the proposed diversion facility that fully protects the SRS Contractors' senior water rights, SRS Contracts with Reclamation, and area of origin protections firmly founded in California law.
729	Erik Vink Delta Protection Commission	Protect Delta Water The reliability of water supplies for in-Delta users and the Delta ecosystem must be fully protected. Our local water utilities, farms, resorts, and industries benefit from abundant fresh water. Our fish and wildlife are attuned to the pulses of this water as it interacts with the Delta's tides. Complex infrastructure built to manage this water, including siphons, diversions, drains, other discharges, and levees, is also carefully adapted to current conditions. This water is protected by our rights as an area where these waters originate, by other water rights, and by federal and State law. Any Environmental Impact Report (EIR) for Delta isolated conveyance must carefully evaluate any harm to the region's water and fully protect all its uses, including its water management infrastructure.
729	Erik Vink Delta Protection Commission	Use the Best Science The EIR must be based on the best available science and employ adaptive management where impacts within the Delta are uncertain. Data about the Delta must be carefully collected and shared for review. Evaluations of impacts to agriculture, tourism, transportation, housing, cultural assets, and other Delta resources must be peer-reviewed, as should economic studies used to consider mitigation measures' feasibility. Where effects are uncertain, actual effects during the construction period should be monitored so that mitigation can be adjusted based on actual conditions rather than inexact forecasts.
729	Erik Vink Delta Protection Commission	Outline cumulative long-term effects. The complexity and potential connections among the many potential actions affecting Delta water resources that are currently under study contributes to Delta residents' concerns about the project. To address these concerns, the EIR should describe how the tunnel could be operated under a scenario in which planned reservoirs, including Sites, expanded Los Vaqueros, expanded Pacheco Reservoir, and south of Delta groundwater banks are completed and operated, as proposed in funding proposals to the California Water Commission. The reservoirs and groundwater banks are reasonably foreseeable: State and in some cases federal funds have been awarded, draft feasibility reports are sometimes complete, as is Sites Reservoir's draft EIR, and south-of-Delta water agencies have joined as sponsors supporting the projects. It is often stated that these projects' value depends on improved conveyance that can move water stored north of the Delta to those new storage areas proposed south of the Delta, but it is unclear how this would alter operations of the tunnel or its impacts on Delta water resources. This should be explained.

729	Erik Vink Delta Protection Commission	Improve through-Delta conveyance and reduce reliance on exports. The Delta Protection Commission advocates improved through-Delta conveyance, rather than the isolated facility proposed by DWR. In recognition of our recommendation and because the project proposed by DWR addresses only some of the factors that contribute to the unreliability of Delta water exports, the EIR should also include an alternative that promotes water reliability by dredging key Delta channels and strengthening Delta levees, rather than tunneling under the Delta, while also reducing other region's reliance on water from the Delta by investing in water use efficiency, water recycling, and other advanced technologies, as discussed above.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must include substantive consultation, including disclosure and discussion of all alternatives and mitigation measures for the Project with local Clarksburg community land use agencies and advisory bodies.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The proposed Delta Conveyance Project presents a series of substantial direct and indirect effects (including environmental effects), socioeconomic effects, and cumulative effects both on the Old Schoolhouse and on the Schoolhouse Project.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must include substantive consultation, including disclosure and discussion of all alternatives and mitigation measures for the Project with local Clarksburg community land use agencies and advisory bodies.
733	Tom Williams	Provide Public with a standard Definitions/Glossary of terms used and their numerical use.
733	Tom Williams	Provide definitions and quantification of specific terms: practical, feasible, reasonable, and adequate.
733	Tom Williams	Provide Publicly Accessible information through direct WWW-links, appendices, and responses to Scoping comments.
733	Tom Williams	Provide dictation in an appendix or direct link via DWR webpages involving any "personal communications" references.
733	Tom Williams	Provide all footnotes to be included in a bibliography or list of references, with appropriate linkages for direct Public access.
733	Tom Williams	Provide Qualifications of all "Preparers" and their corporate affiliations for 2010-2021.
733	Tom Williams	Provide quantitative and explicit current Project Goals/Objectives/Policies and Purposes/Needs for Public proposing of mitigative/compensatory alternatives.
733	Tom Williams	Provide direct numerical relations for current proposed Project, any current alternatives, and current GOP/PNs.

733	Tom Williams	Provide numerical/quantified definitions of "reliability" and for "potentially" for this review and previously for water resources reviews by DWR during 2015-2021.
733	Tom Williams	Withdraw and revise current CEQA documents (NOP, IS, and Assessment of Significance) and recirculate as combined EIR/EIS with appropriate state and federal documents. As indicated below, provide the inclusive document for Public Scoping Review and Scoping.
733	Tom Williams	Provide public access to all referenced/cited document. Prohibit or provide dictation of any referenced/cited "personal communications"
733	Tom Williams	DEIR must evaluate and assess the Tunnel Project in light of Climate Change, including changes of flood flows and sea-level rise
733	Tom Williams	DEIR must assess impacts of providing flood And non-flood waters/flows to the Entire Project
733	Tom Williams	Provide and assess alternatives for flow diversions at Mean, Median, and Modal flows and for flood(s)
733	Tom Williams	DEIR must provide both overall and segmented environmental assessments and provide a "Programmatic DEIR and provide a Draft Mitigation, Monitoring, and REPORTING Plan in the DEIR
733	Tom Williams	DEIR(/DEIS) must assess all elements and aspects required of a Federal Partner requirements (=DEIS) for proposed and physical maximized exports for Flood and Modal/Median/Mean flows.
733	Tom Williams	DEIR must Disclose and Assess the future Reduction in Claimed Needs for the Tunnel Project as a result of New Technologies and Curtailed Exports
733	Tom Williams	Providing two NOP statements causes confusion and distractions within the Public and perhaps agencies. Withdraw current Initial Study and Q&A, merge, and recirculate as appropriate as Subsequent NOP.
733	Tom Williams	Provide quantitative, numerical, and explicit definitions and comparisons for those areas with and those areas without SWP/CVP pumping stations within the Project region by northern, central, and southern sectors of the Delta regarding a) the risks and the damages excepted by earthquakes and b) by inundation of brackish and freshwaters.
733	Tom Williams	Provide detailed, quantitative assessment of and mitigated/compensated measures for all elements of a typical EIS for federal compliance as part of the DEIR and draft MMRP.
733	Tom Williams	Provide more consistent abbreviations for agencies. US Department of Interior, Bureau of Reclamation (e.g., BoR or USBOR).
733	Tom Williams	Provide all prospective permits and approvals through the USCoE for the Delta Conveyance and how CoE may be involved.
733	Tom Williams	Provide a quantitative, numerical review and analyses for the reliability of all elements of the State Water Project and the proposed Project and any connections between the two and potential threats and risks for each and their combination.
733	Tom Williams	Define and quantify potential, 1/100, 1/250, 1/500…etc.

733	Tom Williams	Provide a complete and thorough analyses of seismicity, ground movement, for all "major earthquakes (e.g., >4 RM at 10 mi and 10,000ft depth).
733	Tom Williams	Provide a thorough, numeric, and quantitative analyses of any earthquake which would cause damage to and breaching of any levee between the inlet and outlet points of the proposed Project. Define and assess public health and safety impacts for the above damages and breaches of levees.
733	Tom Williams	Include CVP and its assessment in the DEIR/Draft MMRP.
733	Tom Williams	Define quantify "major earthquake" (RM, duration, distance, and depths) and probable river flow conditions causing a breach.
733	Tom Williams	Provide delineation and requirements for "inundation of brackish water" and "areas in which…SWP and CVP…operate".
733	Tom Williams	Define and provide direct public access to specific "other existing agreements", state/federal laws, and relevant "terms and conditions of…contracts". Provide linkage between relevant structures and operation with the appropriate agreements, laws, and terms and conditions.
733	Tom Williams	Don't use footnotes, use and provide publicly accessible citations/references/links/appendices.
733	Tom Williams	Define numerical/quantified measures for each objective and use in numerical/quantitative comparisons of alternatives in DEIR.
733	Tom Williams	Provide clear and thorough definitions, numerical ranges, and specific quantified terms for: More reliably capture, Water during and after storm events, Protect existing supplies, Threats, Climate change, Sea level rise (averaged, HHT and LLT), Earthquakes (RM -1 – 7, 0.1 – 0.5 G), Pursuing, and Local supply resiliency projects
733	Tom Williams	Which public water agencies are participating in the Delta Conveyance Project?
733	Tom Williams	Provide complete and thorough Financial analyses and assessments and costs/benefits analyses
733	Tom Williams	Provide clear and thorough clarified glossary, listings, and definitions, numerical ranges, and specific quantified terms for: More reliably, capture, during, after storm events (?flows or precipitations), Provide complete definition and enumeration/quantification for (with statistics of long -term mean/median/modal plus 1-2-3 Std.Dev.) existing and flood/Project flows.
733	Tom Williams	Provide an online schedule of all meeting related to the project (subject to revision) and attendees as committed/revised. Also clearly identify the association of all member and attendees for the meetings. Include the schedule as part of the ongoing draft/later MMRP.
733	Tom Williams	Provide list of all SWP contractors, current allocation and future allocation with 7500cfs, Cost Allocation Methodology, Assess, potential, associated, Reasonably foreseeable potential, Contract modifications, and Preliminary contract negotiations.
733	Tom Williams	Provide online collection/data base for opportunities and "Other permits and environment review processes". As required through the NOP/Q&A provide cost estimates, B/C Analysis, Financial Analysis, and Operations; assure that such includes the "less-than-flood flow" to "flood flows" and Project diversions.

733	Tom Williams	Provide an updated draft of the Costs, Benefits, Cost Analysis, and Financial Analyses commensurate with the staged assessment and mitigation for the proposed Project.
733	Tom Williams	Provide descriptions and flow charts for all and "other permitting processes" and provide criteria and results expected for their "completions"
733	Tom Williams	Provide definition and examples of CESA.
733	Tom Williams	Provide access to an example of contents of a current, "preliminary" and "Final Operational Plan" and assumptions for each.
733	Tom Williams	Provide detailed descriptions, PFDs/P&IDs, and links to equipment suppliers and certification authorities for fish screens and sources for designation of "state of the art" fish screens.
733	Tom Williams	Provide definitions for state-of-the-art and practical/reasonable/effective fish screens.
733	Tom Williams	Provide alternative descriptions and assessments for single, highest intake for 6000 and for 7500cfs flows.
733	Tom Williams	Provide definition of "ancillary facilities", e.g., chemical additives and mixing.
733	Tom Williams	Provide definition and description of "tunnel shaft" and its relationship to the intake (northern) forebay and alternatives for cut-&-cover, shallow, and deep intake tunnels.
733	Tom Williams	Provide list of "reasonably foreseeable potential contract modifications", e.g., increased diameter, multiple diversions(intakes), additional TBM Shafts, etc., and additional assessment, mitigation, and monitoring, and reporting plans, including recirculation of Amended DEIR/DEIS) for any "Contract Amendment (Project Description, changes).
733	Tom Williams	Tunnel and Tunnel Shafts: Provide diversion (0.0-mile, 10-mile, and 20-mile downstream points from Forebay) hydrographs of flows (velocities, volumes, elevations, etc.), temperatures (at -10% and -90% depths), and TDS (at -10 and -90% depths).
733	Tom Williams	Provide channel hydrographs at 0.1-, 10-, 20-, 50-, and 100-mile downstream of Forebay discharge point(s) (velocities, volumes, elevations, etc.), temperatures (at -10% and -90% depths), and TDS (at -10 and -90% depths) prior to discharge for local uses along the Valley Conveyance.
733	Tom Williams	Provide simplest physical alternative for the Project alignment, dead-straight path from uppermost diversion on Sacramento River to the Intake facility for the Clinton Forebay with at least one shaft (mid point) and not more than four equally space shafts for tunnel-boring-machine drives/starters and reception/receivers, excluding any shafts at start and finish.
733	Tom Williams	Provide text, graphical, numeric and Process Flow Diagrams (PFD/P&ID) descriptions including connections to all districts and end-users of water through the tunnel(s) and Delta Fore Bay.
733	Tom Williams	Provide text, graphical, numeric and Process Flow Diagrams (PFD/P&ID) descriptions for identified components (e.g., inlets, inlet-forebay tunnels and shafts, shafts for both forebays,
733	Tom Williams	Define, delineate, and describe specifically "connecting tunnel reaches.

733	Tom Williams	Provide definitions, delineation, and description specifically for “launch” compared to “retrieval” shafts and alternatives of double launch, of double retrieval shafts, and of combined retrieval/launch shafts.
733	Tom Williams	Provide description of Site recovery including demolition/removal of 45ft high concrete shaft freeboard and earthen reuse.
733	Tom Williams	Provide alternative depths of 40ft x3 = 120ft to top/160ft to bottom. Require that shafts include 20-40ft below the elevations of the tunnel bottoms.
733	Tom Williams	The DEIR must assess the seismic risk/stability of the 30ft “above ground” levees/walls of the forebay(s).
733	Tom Williams	Provide definitions, tabular, and graphical/numeric delineations for “Project Area”, “Study Areas”, “Regions”, “Service Areas”, “Resource Areas”, and all water recipients and contractors for local distributions.
733	Tom Williams	Alternatives: Provide definitions and numerical/quantified ranges for reasonable, feasibly/infeasibly, potentially feasible/infeasible, foster, and most and basic vs all objectives.
733	Tom Williams	Provide a clear, thorough, and quantitative setting/Project and alternatives considerations by number of intakes, maximum diversion volumes for intakes, and channel flows before and during diversions.
733	Tom Williams	Provide alternatives including straight line route for tunnel from intake-south pumping station, boring with only two TBMs (meeting in between), and depths of 120-160ft (rather than 190ft).
733	Tom Williams	Public Services & Utilities: Provide maps, graphic, and quantitative modeling of all area which could receive Project water at any time by month and seasons, and annual medians and +/- 1Standard Deviations.
733	Tom Williams	Provide definition and quantification of “Other Indirect Effects”.
733	Tom Williams	Provide thorough, complete, and quantitative impact assessment and mitigation for growth/user areas receiving any significant derived project waters (e.g., >10 acre-feet/year) and incorporate California Dept. Finance projections with and without such project waters to 2045 (using 2020 census).
733	Tom Williams	Provide definitions and quantitative measures and assessment models for all major environmental sectors, e.g., hydrology, land uses, and cost/benefits, “potential” and “substantially”.
733	Tom Williams	Provide power requirements for all facilities within 5x5mi gridded base or by transformer stations over the entire Project area.
733	Tom Williams	Provide definitions of “certain” facilities vs all facilities.
733	Tom Williams	Alternatives: Please provide clear and complete definitions along with quantitative applications for: Reasonable, feasibly/feasible/infeasible, most, basic (vs all) objectives, conceivable, and potentially. As these terms have economic associations, provide as part of the DEIR/DEIS quantified economic analyses of alternatives, including construction, initial operations (Yr 1-5), and later operations (Yr 10-12).
733	Tom Williams	”Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. Ca. Pub. Res. Code § 21061.1 Therefore provide economic setting and assessment of Project on the economic development through 2045 for all areas receiving any Conveyance waters.

733	Tom Williams	Provide impact assessment and mitigation for "Geology and Seismicity: changes in risk of settlement during Life of Project, during construction and operations".
733	Tom Williams	Provide thorough, quantitative, and mapped production for temporary storage, treatment, and ultimate "reuse" or "disposal" of tunnel muck debris (>30% fluids) and its impacts and mitigation/monitoring on impact sectors below, through 0-10 years.
733	Tom Williams	Provide objectives for DC and for WaterFix and clearly identify those that differ between the two projects. DWR Q&A 2/1 5. How does this…differ from the previous California WaterFix project? The objective of the proposed project is…largely the same as WaterFix: to restore and protect the reliability of water supplies that move through the Delta by adding flexibility with a new point of diversion and new infrastructure.
733	Tom Williams	Provide clarification regarding the Scoping for this Project (DC) and an unexpanded Scoping for other projects.
733	Tom Williams	Provide definitions and clarification for use of vague terms used throughout the NOP, such as: will also involve, likely requiring, may include, anticipated…NEPA compliance, relevant NEPA information, once established, federal lead agency vs Lead Agency, and if appropriate.
733	Tom Williams	Provide definitions and quantification of "seismic event(s)" along with distances, depths, periods, intensities, and surface responses and probable damages to levees and other infrastructure facilities.
733	Tom Williams	Provide definitions and quantification of current levees stability responses to a "design seismic event".
733	Tom Williams	Provide definitions and quantification of lowest intensity likely (1/500) to produce a breaching of a levee under "normal" flows and in the event of "Plus 5-foot flows" (flood or sea rise).
733	Tom Williams	Provide in the DEIR/DEIS a Draft Mitigation. Monitoring, and Reporting Plan for the Project.
733	Tom Williams	Provide definitions and quantification of seismicity and risks for the Forebay, named water conveyance facilities, and pump stations.
733	Tom Williams	Provide clear definitions and procedural estimations for "risks", "threats", "likely", "could's, would's and should's", and "can's, will's, shall's, and must's"
733	Tom Williams	Provide quantitative estimates of "Climate Changes" for the life-of-project (e.g., 50 years) and increased variability (Coefficients of variation, standard deviations/errors for norms, +/- 4-5-6thSD for Higher-Storm/Lower-Drought flows.
733	Tom Williams	Provide definitions and quantifications for "reliability", "reliably", "flexible", and "flexibility".
733	Tom Williams	Provide review of all eligible/suitable areas of Groundwater Resources for recharge and production using "Delta-Conveyance waters" – Sources and Destinations.
733	Tom Williams	Provide quantitative records (maximum, flows, duration, elevations, etc.) for 2010-date bypassing all "Flood Flows".
733	Tom Williams	Provide and quantify the most probable recipient of averaged, base, and one-month periodic flows and whether for direct use or indirect reuse after underground or surface storage.

733	Tom Williams	Provide maps of all measurable, recordable seismic events 0 - +7 RM within 50 miles of any proposed tunnel alignments and within 100 miles of any Project shaft. Provide map with correlations of events with most probable fault plane (including surface traces and subsurface projections).
733	Tom Williams	Provide map of any known or suspected "blind fault plane" within 25 miles of any alignment.
733	Tom Williams	Provide a map of all known breaches of levees within the Project region and 50 miles above and below planned physical facilities and a map of known areas of inundation.
733	Tom Williams	Provide a map and description of all levee reinforcements conducted and placed within the Project region from 1930-Date. Distinguish between earthen works and others (e.g., slurry/grout walls and treatments, cutoff walls, crown barriers, etc.).
733	Tom Williams	Provide technical, numeric, and quantitative reviews and analyses of structural behaviors and movements of: fixed air-filled vertical shafts without any tunnels, single empty/air-filled tunnels within 300ft of the shafts, twin empty/air-filled tunnels within 300ft of starter shafts, single-/twin empty/air-filled within 300ft of receiver shafts, fixed air-filled vertical shafts with air-filled tunnels with 0.0, 0.5, 0.7, and 1.0 G accelerations; fixed partially water-filled vertical shafts with water-filled tunnels with 0.0, 0.5, 0.7, and 1.0 G accelerations;
733	Tom Williams	Provide numeric, quantitative assessment/definitions for any use of cost-effective, efficient, economic, financial, or other non-physical describer.
733	Tom Williams	Provide a Draft Mitigation, Monitoring, and Reporting Plan (Program) as part of the DEIR/DEIS, including all related/tiered reporting for the Public and specifically all Public commenters for scoping and DEIR/DEIS review.
733	Tom Williams	Provide review and facility and operational requirements for Peak/Off-Peak flow diversions from Delta, and through all related facilities, provide locations and facilities required to access diverted flows and those which maybe be required to receive, hold, and recharge underground storage capacities.
733	Tom Williams	Provide review and assessment of secondary, growth induced impacts with expansion/changes of annual and perennial land uses, both agricultural and structured.
733	Tom Williams	Provide list of specific quantified conditions for the EIR and for the EIS Project conditions and operations and require Amended DEIR/DEIS recirculation and review/comment with any physical or operation (flows) involvement of the federal CVP or other such projects.
733	Tom Williams	Provide technical, quantitative and numerical description of source materials, boring related changes, and discharge conditions, and probable treatments and conditions of the RTM ("reusable tunnel material") within 1, 10, and 30 days from discharge beyond the shaft.
733	Tom Williams	Provide technical, quantitative and numerical description of potential reuses for embankments
733	Tom Williams	Provide technical, quantitative and numerical description of other purposes.
733	Tom Williams	Provide technical, quantitative and numerical description of "stored purposes", especially including water contents and strengths.

733	Tom Williams	Provide a separate summary with web-links to sources for all specific details provided by agencies within 60 days of closure of Scoping, including scopes, significant issues and impacts, reasonable and unreasonable alternatives, and all mitigations, monitoring, reporting recommendations, and responsibilities.
733	Tom Williams	Provide alternative description and assessment for the shortest practical tunnel route as shown below (dead straight route) without turns/curves in the tunnel portion and two shafts (two starter/launch shafts with double TBM meeting within the "middle" of the tunnel line).
733	Tom Williams	Provide Non-Tunnel Alternative for improved reliability of Delta flows, Improved Levee Alternative, including slurry/grouted cut-off walls within levees and at least 50% of levee height beneath the levee (e.g., 50ft levee height with 75ft deep/height cut-off walls.
733	Tom Williams	Provide in the Improved Levee Alternative additional provision of "High K-Rail" for raising top of levee by 3-5ft on temporary and then permanent basis.
734	Richard Denton	The EIR must extends the previous modeling period for reservoir and Delta operations and Bay & Delta water quality
734	Richard Denton	CalSim operations modeling for the EIR must meet SWRCB urban water quality standards
734	Richard Denton	Analysis of the water quality impacts of the proposed project in the EIR must use the full available historical period, 1922-2019
734	Richard Denton	The presentation of modeling data and disclosure of environmental impacts in the EIR must be in a form that is usable and useful for decision makers and the public
734	Richard Denton	The EIR must fully model the infrastructure required to comply with the settlement agreement with the Contra Costa Water District
734	Richard Denton	The EIR should use a Daily Operations model
734	Richard Denton	DWR should establish a technical workgroup to provide input to development of the EIR and make modeling data available to the public as early as possible
734	Richard Denton	The EIR must accurately model the conveyance of CVP water, if any, through any new Delta conveyance. The WaterFix CWF H3+ assumed approximately 40% of the water diverted at the north Delta intakes was CVP water even though the U.S. Bureau of Reclamation was no longer agreeing to participate in the project.
734	Richard Denton	The EIR must simulate the actual proposed project operations. In the WaterFix modeling, a Rio Vista minimum flow requirement of 3,000 cfs was assumed for January-August to ensure modeling stability, but DWR did not intend to operate the project with that minimum flow constraint.
734	Richard Denton	The EIR must simulate the operations of the proposed project with and without climate change. The EIR should not only simulate project operations at early long-term but also late long-term when the effects of climate change and sea level rise will be most significant.
734	Richard Denton	The EIR must analyze and disclose the effect of the new intakes on the flow through Sutter and Steamboat Sloughs and the corresponding effect on the passage of migrating anadromous fish, and smelt, through the Sacramento River and Delta Cross Channel system.

736	Kelley Taber County of Sacramento	In developing the proposed Project operations and associated modeling and EIR impact analyses, DWR should carefully consider the issues raised in the County's comments on the WaterFix EIR, including: Sacramento County Comments on Draft Bay Delta Conservation Plan (BDCP), Implementing Agreement and Draft EIR/EIS (July 28, 2014) Sacramento County Comments on Partially Recirculated Draft EIR/EIS for BDCP/California WaterFix (October 30 2015) Sacramento County Comments on BDCP/WaterFix Final EIR/EIS (January 30, 2017) Sacramento County Comments on BDCP/WaterFix Final EIR/EIS (June 6, 2017) Sacramento County Comments on BDCP/WaterFix Supplemental EIR/EIS (September 17, 2018) Sacramento County Comments on BDCP/WaterFix Supplemental EIR/EIS (November 5, 2018)
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should include a map of the project area and show the extent of the impacted areas within Contra Costa County.
740	Ryan Hernandez Contra Costa County Water Agency	Adapting to Rising Tides, a program of the San Francisco Bay Conservation and Development Commission, is currently modeling effects of rising water surface elevations between 12 inches and 83 inches in eastern Contra Costa County during this century. The DEIR should address the impacts of the project with cumulative impacts from rising tides in the Delta and eastern Contra Costa County and propose mitigation measures.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The Draft EIR Must Make CEQA-Required Full Environmental Disclosure the Draft EIR must accomplish full environmental disclosure pursuant to CEQA, meaning the Delta Reform Act mandate to reduce, not increase, reliance on the Delta in meeting California's water supply needs must be set forth front and center when preparing responsive alternatives.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Adequate quantification is necessary to carry out an informed analysis of how much water is actually available for export and how much water can be exported while restoring the Delta. Moreover, it is an undeniable fact that consumptive water rights claims are 5 ½ times more than available supply. Additionally, quantification is necessary to determine how much claimed water needs can be reduced by such means as conservation and recycling. But the NOP indicates that instead of actually conducting the quantification and impact analysis required by CEQA, the Delta Reform Act, and the Governor's Executive Order, DWR intends to cherry pick a proTunnel Project statement or two from the Draft Portfolio to substitute for this study. This will not be legally sufficient.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	And the Executive Order requires the subject agencies to "first inventory and assess" eight subjects, including, "[e]xisting demand for water on a statewide and regional basis and available water supply to address this demand." (Executive Order N-10-19 ¶ 2a.) Other required subjects include, "[e]xisting water quality of our aquifers, rivers, lakes and beaches" (¶ 2b); "projected water needs in coming decades for communities, economy and environment" (¶ 2c), and "anticipated impacts of climate change to our water systems, . . . (¶ 2d.)

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Paragraph 3 of the Executive Order further requires that the “water resilience portfolio" established by the agencies embody seven principles including“, "Utilize natural infrastructure such as forests and floodplains" (¶ 3(b“; "Embrace innovation and new technologies" (¶ 3(c); and “Incorporate successful approaches from other parts of the world.” (¶ 3 (e.) The Executive Order establishes a goal of restoring and maintaining the health of our watersheds.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	DWR Must Evaluate the Reality that DWR’s Federal Partner is Committed to Maximizing Exports Regardless of the Environmental Consequences the Draft EIR needs to address the “practical reality” in which the proposed project is being considered by evaluating the proposed project in light of the actions by DWR’s federal counterpart, the U.S. Bureau of Reclamation. Until recently, there was understanding that federal and state agencies would act in good faith to work together to protect water quality while operating the SWP in the case of the State, and the Central Valley Project (CVP) in the case of the U.S. Bureau of Reclamation. Unfortunately, there is no longer any basis for this understanding with respect to the federal government, as it has continuously abdicated its legal obligation to protect endangered species in the Delta (see full comment letter for details on this statement). The Draft EIR must honestly disclose and assess the kind and degree of damage to freshwater flows and water quality that could result from developing and operating the Project given the federal policy to maximize water exports regardless of the environmental consequences. The Project cannot be evaluated or determined in a vacuum from the federal efforts to maximize project exports. These new federal policies are a practical reality that cannot be swept under the rug by the State in deciding whether to develop the proposed project.
751	Mary Ann Robinson	The EIR for this project must weigh the costs and impacts of any tunnel construction against the costs and impacts of alternatives to building any tunnel.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The EIR impact analyses must include a full evaluation of detailed project operations consistent with those proposed to, and potentially approved by, agencies that may issue permits to the project based on the information in and findings of the EIR. DWR's proposal in the NOP to not analyze final project operations guarantees that not all project impacts would be quantified or mitigated. It also guarantees that the basis upon which other agencies relied upon the EIR would be false and misleading.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Alternative“, "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible." CEQA alternatives must include those which reasonably meet the project purpose and objectives so the language in the NOP is incorrect and misleading. The NOP excludes many of the project objectives and purposes as defined by EO N10-19. These criteria and mandates as identified in our comments on the EO must be included in the project alternative screening criteria. Based on the EO requirements, the Proposed Project does not perform very well and sets a low bar for evaluating other alternatives which do meet these EO criteria as well or better than the Proposed Project. Screening criteria must be rational, defensible and consistently applied in the evaluation of alternatives and alternatives components. The Alternatives Scoping Document, to be released for public review and comment, must demonstrate the criteria and rational for proposed alternatives either being included or excluded from full analysis in the EIR.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effect“, "DWR as the lead agency will describe and analyze the significant environmental effects of the proposed project." CEQA requires that DWR must describe, disclose and analyze all environmental effects (not just the "significant ones") of the project and then determine which are significant.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Given the close similarities of the proposed Delta Conveyance and the BDCP and WaterFix projects the EIR team may draw heavily against those previous works. That said, the BDCP and WaterFix EIRs included a long-list of deficiencies, internal inconsistencies, factual and analytical errors, flaws in logic and execution, data mishandling, conclusions that directly conflicted with presented supporting analysis and blatant omissions of mandatory information which the Delta Conveyance Project EIR must not repeat.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	To convey a sense of the level of deficiencies in the BDCP and WaterFix projects, in total, CDWA and SDWA submitted over 1,000 pages of detailed and substantive comments. Because of their direct relevance to the Alternatives scoping and EIR preparation of the Delta Conveyance EIR, CDWA and SDWA's previously submitted comments to DWR on the BDCP and WaterFix Public Scoping Comments and draft and final EIR/S are herein incorporated by reference as part of our scoping comments for the Delta Conveyance project Scoping Comments.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	CEQA requires use of best available science. The BDCP and WaterFix EIRs eschewed use of some commonly used and accepted modeling and analytical tools to avoid disclosure and quantification of a number of key environmental impacts of those projects. The Delta Conveyance Project EIR must not repeat these same deficiencies in the use of best available science. These models and analyses which must be used to the CEQA best available science standard include: a) CalSim–3 - This latest generation tool for analyzing for SWP system-wide mass balance flows has higher temporal resolution and accuracy than the previous outdated CalSim versions. This best available science model data is critical to the accuracy and completeness of all hydrologic and water quality impact analysis as CalSim feeds critical information to drive SWP operations models which are also required for impact analysis of the project. The BDCP and WaterFix EIRs declined to use this best available science tool which must not be repeated by the Delta Conveyance Project EIR. b) Operations Models for the Delta Conveyance Project. These operations models respond to CalSim input with their own respective operations that fulfill demands as defined in the CalSim 3. The respective SWP operations models define a set of operations which fulfill the CalSim water supply demands while the operations models comply with water flow and quality requirements. The CALSIM and operations models are run iteratively until a water operations solution is achieved which optimizes meeting water supply demand while complying with water quality and quantity operational and environmental legal requirements. All SWP facility components have operations models including Oroville Reservoir, Thermalito Afterbay, Banks Pumping Plant, the California Aqueduct, San Luis Reservoir and all other SWP pumping plants and reservoirs. The BDCP and WaterFix projects never defined operations for their facilities for operation of water intakes, reregulating reservoirs, pumps, etc. so impact assessments of those operations were never conducted in those EIRs. Without those facilities operations impact analyses in the EIR, the project cannot be permitted as impacts from them have not been disclosed, evaluated or mitigated. Most critical and missing from the BDCP and WaterFix facilities operations models was the intertidal operations of the north delta intakes to comply with fisheries requirements for maximum approach velocity, minimum sweeping velocity and maximum duration of exposure of listed fish species to the proposed intake fish screens. Accurate modeling of 30 velocities at the fish screens requires high resolution bathymetry at the intake selected site and design characteristics of the intakes. These are all required for a project-level analysis of impacts which would be required to secure construction-related permits. The Delta Conveyance Project does not define exactly where water diversion structures would be placed so the required analysis of fish screen fish criteria compliance is not possible for this EIR making it deficient for potential consideration of Incidental Take Permits (ITPs). c) Delta Salinity Water Quality Models - DSM2 has a Salinity analysis module that the BDCP and WaterFix EIR analysis did not utilize to the level of best available science. The out of date and not utilized available bathymetry data utilized in the BDCP and WaterFix DSM2 modeling caused those analyses and impact evaluations to mischaracterize and under-estimate project impacts. The magnitude of the gap in the old bathymetry characterization vs. current reality and available data results in such a disparity that the self-cancelling error of the model utilized in a comparative analysis manner no longer functions usefully or defensibly. CEQA's best available science requires that available updated data be integrated into the data set to be used for analysis in the Delta Conveyance Project EIR. The DSM2 salinity module has been used on other Delta water projects that included updated bathymetry data collection. Significant portions of the delta have updated bathymetry data collected

	and available from these recent projects. This data must be integrated with the rest of the available bathymetry data for the EIR. SDWA can provide information regarding sources for these more recent data sets. Current and accurate bathymetry data is essential to conducting the most accurate and representative salinity modeling for impacts analysis and development of proposed operations to avoid and minimize salinity impacts as well as identify and evaluate potential mitigations as CEQA best available science requires. The Delta Conveyance Project has already set the precedent that it will collect new field data to further the design and analysis for the project with its current and on-going program to collect additional geologic core samples along the proposed tunnel conveyance route. With DWR's precedent for new field data collection established for this project, the Delta Conveyance Project should put equal emphasis, investment and time in collecting important supplemental information to support accurate environmental impacts analysis. Supplemental selected area bathymetry data must be collected as needed to compliment other available data to represent current Delta channel conditions to ensure that a useful and meaningful modeling analysis of salinity impacts is conducted by the Delta Conveyance Project EIR. Dissolved Oxygen Water Quality Models - DSM2 has a Dissolved Oxygen (DO) analysis module that the BDCP and WaterFix did not utilize. Many other existing, generally accepted and suitable DO models are applicable to the DO impact analysis for the Delta Conveyance Project. The BDCP and WaterFix shamefully used no quantitative analysis on this critical project impact. Instead the BDCP and WaterFix EIR/S relied upon an unsupported, subjective, rationally inconsistent, qualitative assessment, professional judgment call for the only content addressing this pivotal impact. All of the relevant information regarding reduced flows and water turnover as well as nutrient load increase combined with increased water temperatures was ignored in favor of finding of no significant impact from DO that was supported by no collaborating documentation or analysis. The Delta Conveyance Project does not have to use DSM2 for the DO analysis, but it cannot fail to do no quantitative analysis as its DWR predecessor EIR projects have done. e) Inappropriate Temporal Aggregation of Data for Analysis and Impact Cals - The BDCP and WaterFix project EIRs aggregated data to obscure peak events which were relevant to disclosing, analyzing and mitigating project impacts. Temporal aggregation of data sets hides the range of conditions and extremes of conditions and impact as relevant information is lost due to it being averaged into other dissimilar data. Rolling two week averaged data used for an impact analysis or evaluation of project compliance with water quality requirements hides peak events and impacts. As an example, data can have low values most of the time but have extreme outliers (i.e. 4 plus standard deviation events) that are completely masked in the temporal averaging data treatment. In the case a rolling two week data averaging, if water temperatures are suitable for a fish to survive for 13 out of the 14 days but very unsuitable on one day; on average the water temperature is fine and no impact is determined, but in reality all of the fish are still dead from that one day. The same goes for salt load in irrigation water. On a 2 week average the amount of salt may be below that a crop can theoretically tolerate, but the one salty irrigation during that period killed the crop and poisoned the soil which is not disclosed by inappropriate data averaging and temporal aggregation. The Delta Conveyance Project EIR must not utilize temporally aggregated data sets for impact analysis or utilize significance criteria which rely upon temporally aggregated data sets.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The Delta Conveyance Project Extends the Operational Lifespan of the S–P - The No Project Assumption of the Delta Conveyance Project EIR includes a O' increase in sea level. This sea level rise would effectively end the viability of the SWP water supply approximately by or around the year 2050. Therefore, the Delta Conveyance Project must include as part of their direct, indirect and cumulative impacts assessments in the EIR, the on-going impacts and incremental impacts of continued operations of the SWP beyond the time period in which it would have been viable without the project (the No Project). The SWP Water Supply Contract Extension Amendment EIR was legally obligated to disclose, analyze and mitigate this impact, but omitted this impact from its impact scope by incorrectly assuming the contract extension as the No Project condition. With the Sea Level rise assumption of the Delta Conveyance EIR, the EIR may not avoid including assessment of these ongoing and incremental impacts of continued operations of the SWP.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Delta Conveyance Project Water Transfer Impact Analysis -The SWP Water Supply Contract Delta Conveyance Amendment deferred its impact analysis of water transfers to the impact analysis to be conducted under the Delta Conveyance Project EIR. The impact analysis of water transfers requires a detailed analysis of available water transfer capacity opportunity created by the Delta Conveyance Project. In order to conduct this water transfer capacity analysis at a project-level of impact (and construction-related permitting), a detailed hourly set of operations of the water intake structures must be defined. This is a set of operations that the BDCP and WaterFix never defined, disclosed or analyzed. The hourly operations of these intakes are required to determine what flows can be diverted based of flow velocity variations that occur within the intertidal conditions at the intake specific intake locations (as yet to be) proposed. This analysis of potential intake diversion operations that comply with intake local conditions for fish criteria compliant operations against baseline SWP project operations demands determines what the potential excess capacity is for water transfers. The NOP does not define proposed operations or specific project-level locations for the intakes so this required level of analysis is not possible in this EIR.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Agricultural Resources - The BDCP and WaterFix EIR/S agricultural resource analysis ignored impacts of saltwater intrusion into the delta on agricultural water supply quality and shallow groundwater recharge salinity impacts to delta island, tract and district soils. These analyses similarly ignore salt accumulation impacts from the project in SWP service areas. With the viable lifespan extension, the Delta Conveyance Project provides the SWP system with extension of viability beyond those currently feasible with Sea Level Rise, all subsequent soil salt accumulation in the SWP Service Areas are impacts of the Delta Conveyance Project. The Delta Conveyance Project EIR should use (at a minimum) the methodology and impact analysis approach from the USBR Remand EIS to assess the project impacts on these agricultural resources.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Growth Inducing Impacts - The growth assumption (and stated project objective to "restore water supplies" and "support population growth") indicates an objective of the project to provide increased long-term water supplies creating hardened demand from project induced population growth. Therefore the project must disclose the magnitude, location and nature of growth induced; and analyze and mitigate those Growth Inducement impacts. The BDCP and WaterFix projects claimed the project would "create no new water" (which was false), so they did not conduct growth inducement-related impact analyses. The Delta Conveyance Project clearly states it will induce growth so all impacts related to this objective must be analyzed, disclosed and mitigated in the EIR.
755	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	Preparing impeccably documented, scientifically based, research that will then logically and rationally, support and justify, findings and conclusions, as to best option(s) for proceeding on the goal of enhanced water supply AND Minimized detrimental environmental impacts. Anything less will invite more water battles. Failing examples include Trump “Science.” Or, Reverse Science , where a predetermined outcome causes the scientific effort to be compromised, and otherwise undermined; and a narrowly focused scientific analysis that does not encompass all available and pertinent information bearing on finding the best (minimized short and long term environmental damage balanced with cost efficiency) outcome.
755	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	Add the specific and cumulative effects of three more deleterious challenges to Delta ecosystem’s survivability: a> The problems, disruption, damage, and pollution to the Delta-- especially, its aquatic connectivity and viability, inclusive of the dependent species-- from years of the various negative impacts along with their long term residual effects, caused by the construction and prep phase of the project. b> Projections of all the real and growing, future climate change/sea level rise negative impacts – up to the year 2100. c> Final– --and most importantly for this document-- add an evaluation of all the negative impacts from plans for a huge tunnel that will further facilitate, the historic southern bias for more, always more, Delta fresh wat– -- also, up to the year 2100.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Assuming, on the other hand, that it is DWR’s plan to use the project to abandon the maintenance of adequate Delta water quality in the wake of sea level rise: (e) All in all, the EIR must provide a thorough and detailed analysis of the entire and expansive range of direct and indirect impacts that may foreseeably result from the abandonment of maintaining adequate Delta water quality at every stage of that abandonment, from its inception through all reasonably foreseeable sea level rise scenarios, and a thorough and detailed analysis of potentially feasible alternatives and mitigation measures to avoid or minimize such impacts for all of those scenarios.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	Additional Impacts to Discuss and Analyze: In addition to countless other impacted resources and facilities, including those set forth in the CDWA's prior and other scoping comments, the EIR must thoroughly discuss and analyze the project's impacts to the following resources and facilities from all aspects of the project, from the environmental and geological investigations to the construction and operation of the project, and thoroughly discuss and analyze mitigation measures and alternatives that could avoid or reduce such impacts: i. Levee systems. ii. Drainage systems. iii. Other Reclamation District facilities, including roadways, bridges, levee access ramps, etc. iv. Irrigation systems. v. Groundwater wells. vi. Agricultural land. vii. Habitat land. viii. Waterfowl and other wildlife propagation. ix. Recreation, including hunting, boating, fishing, swimming, water skiing, windsurfing, etc. x. Air quality. xi. Surface water quality. xii. Ground water quality, including salinity intrusion into groundwater basins.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Piecemealing: Over the last decade, DWR's pursuit of a tunnel has been fraught with piecemealed CEQA analysis in many respects. While CEQA requires DWR to evaluate the "whole of the action" that constitutes the project, DWR has separated components of that action and analyzed them in isolation of the rest of the components. The "whole of the action" that constitutes the instant project also includes DWR's Coordinated Operations Agreement with USBR which will be directly and substantially affected by DWR's operations under this project. Those coordinated operations, and all other components of the "whole of the action" that comprise this project, must be thoroughly set forth in the EIR as components of this project and thoroughly discussed and analyzed therein.
771	Melinda Terry California Central Valley Flood Control Association	The EIR should include a Flood Chapter that identifies the design, operation, and construction components that propose altering the State Plan of Flood Control (SPFC) or could potentially increase flood risks in the Delta.
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Cumulative effects on the flood control system, particularly SPFC facilities and operations.

776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	Given that the location of the proposed project is outside of BCDC's jurisdiction, BCDC is focused on the potential impacts of the proposed operations of the proposed Delta Conveyance project on the Bay and Marsh. The NOP states, "although initial operating criteria of the proposed project would be formulated during the preparation of the upcoming Draft EIR in order to assess potential environmental impacts and mitigation, final project operations would be determined after completion of the CEQA process, obtaining appropriate water right approvals through the State Water Resources Control Board's change in point of diversion process, and completing the consultation and review requirements of the federal Endangered Species Act and California Endangered Species Act." It is unclear whether the review in the DEIR would assess the potential range of operational impacts from the proposed project. BCDC requests that the DEIR include a detailed assessment of the impacts of the operating criteria to avoid segmentation of the environmental review between the localized project impacts and operational impacts of the project, which are more far-reaching. These operations and related impacts should be addressed in tandem in the DEIR as a complete project with all related impacts, including a suite of options and alternatives. For regulatory agencies to make a well-informed decision on the preferred alternative, the project should be addressed as a whole.
776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	We further request that the DEIR address cumulative impacts from storage and tunnel projects, as well as existing habitat and proposed restoration and mitigation projects across the system.
781	Janet Wall Wintu Audubon Society	Cumulative impacts must be analyzed pertaining to water quality . Will pesticides, mercury and pollutants become more concentrated due to decreased flow in the Delta. Will salinity be increased.
783	Mark Miyoshi Winnemem Wintu Tribe	This EIR must study the cumulative effects of the Project and the many past and reasonably foreseeable future projects on upstream source regions and ecosystems. All of the projects on the Sacramento combine to restrict the downstream AND UPSTREAM migration of species, nutrients, DNA and more. Sites Reservoir and the many over-allocated diversions have increased temperatures, decreased flows and altered the timing of flows. Shasta Dam has already denied Salmon and other salmonids access to headwaters spawning grounds and the Project will be another major hurdle for adult Salmon going up the Sacramento River and young smolts migrating south to the ocean. Salmon are the most visible and understandable element of the river bio-connection that has enriched the source regions with elemental resources and nutrients from time immemorial. This exchange is not trivial and the Project could close this bio-connection door with unknown future consequences.
783	Mark Miyoshi Winnemem Wintu Tribe	The Delta is on the verge of collapse now and the Project will add many additional and intense stressors to this struggling biome. The Project could very well be the death of the Delta. The protection of biological resources must by law carry equal weight in this EIR to the perceived benefits to human habitation and economy. A valid and rigorous study of the viability and survivability of the Delta if the Project is implemented must be a key element of this EIR. If the Delta will not survive the Project intact, then the Project must be abandoned.

789	Jeff Henderson Delta Stewardship Council	As a preliminary matter, in 2018 DWR submitted a Certification of Consistency with the Delta Plan for the California WaterFix project. This certification was appealed by nine parties, who alleged that for various reasons the project was not consistent with one or more Delta Plan policies. Council staff reviewed both the certification and appeals and provided a staff draft determination for the Council's consideration in November 2018. The staff draft determination is available upon request from archives@deltacouncil.ca.gov. The staff draft determination describes the certification and appeals and makes staff recommendations regarding whether the certification was supported by substantial evidence in the record with respect to issues raised in the appeals. The staff draft determination stated that the certification was not supported by substantial evidence in the record for multiple Delta Plan policies: G P1, subd. (b)(1) (Cal. Code Regs., tit. 23, § 5002, subd. (b)(1)) ("G P1(b)(1)"): Full consistency infeasible, but on the whole the covered action is consistent with the coequal goals G P1, subd. (b)(3) (Cal. Code Regs., tit. 23, § 5002, subd. (b)(3)) ("G P1(b)(3)"): Best Available Science WR P1 (Cal. Code Regs., tit. 23, § 5003) ("WR P1"): Reduce Reliance on the Delta through Improved Regional Water Self Reliance ER P1 (Cal. Code Regs., tit. 23, § 5005) ("ER P1"): Delta Flow Objectives •DP P2 (Cal. Code Regs., tit. 23, § 5011) ("DP P2"): Respect Local Land Use When Siting Water or Flood Facilities or Restoration Habitats Although DWR ultimately withdrew the certification, Council staff recommended that the matter be remanded to DWR for reconsideration to address several issues outlined in the staff draft determination regarding these policies. Because the Project appears similar to California WaterFix in some areas, based on the previous record for California WaterFix, the Council recommends that DWR review the staff draft determination as it relates to the Project and engage with the Council in robust early consultation to ensure that the EIR addresses these matters in detail.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy G P1, subsection (b)(1) (Cal. Code Regs., tit. 23, § 5002, subd. (b)(1)) allows for covered actions, in a certification of consistency, to include a determination that despite inconsistency with one or more other Delta Plan policies, the covered action is consistent with the Delta Plan because, on the whole, it is consistent with the coequal goals. In the EIR, DWR should analyze and document potential impacts – whether positive or negative – on the coequal goals. It may be useful to describe the impacts of the Project on the coequal goals to the public in the EIR to establish a record for a future certification of consistency.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy G P1, subsection (b)(3) (Cal. Code Regs., tit. 23, § 5002, subd. (b)(3)) states that covered actions must document use of best available science as relevant to the purpose and nature of a project. The regulatory definition of "best available science" is provided in Appendix 1A of the Delta Plan (https://www.deltacouncil.ca.gov/pdf/delta-plan/2015-appendix-1a.pdf). Best available science is defined in the Delta Plan, Appendix 1A. Six criteria are included in Appendix 1A: relevance, inclusiveness, objectivity, transparency and openness, timeliness, and peer review. (Cal. Code Regs, tit. 23, § 5001, subd. (f).) This policy requires that the lead agency clearly document and communicate the processes and information used for analyzing project alternatives, impacts, and mitigation measures of proposed projects, in order to foster improved understanding and decision making. As it develops the EIR, DWR should identify and document use of best available science when analyzing and assessing impacts, including but not limited to the following areas: Documentation of consideration of best available science in analyzing the selected project alternatives. Best available science on climate change, including sea-level rise projections appropriate to the type of project and planning horizon selected. Consideration of best available science related to invasive species and water quality issues such as salinity, nutrients, harmful algal blooms, and contaminants. If a range of uncertainty is associated with the scientific data or information used to support design decisions or environmental analysis, DWR should document or communicate the uncertainty as required by the best available science Transparency and Openness criterion.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy WR P2 (Cal. Code Regs., tit. 23, § 5004) requires the contracting process for water from the SWP and/or the CVP be done in a publicly transparent manner consistent with applicable DWR and Bureau of Reclamation (Reclamation) policies. The Council notes that DWR has proposed extension of the SWP contracts as a separate project. However, the NOP states that the Delta Conveyance Project may involve modifications to one or more of the SWP water supply contracts to incorporate the Project. (NOP, p. 6). To the extent that the Project includes the types of contract modifications described generally in the NOP, the EIR project description should clearly identify such modifications, and the EIR should assess potential environmental impacts associated with reasonably foreseeable potential contract modifications (as described in the NOP, p. 6).
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy ER P3 (Cal. Code Regs., tit. 23, § 5007) states that within priority habitat restoration areas (PHRAs) depicted in Appendix 5 (https://deltacouncil.ca.gov/pdf/delta-plan/2013-appendix-b-combined.pdf), significant adverse impacts to the opportunity to restore habitat at appropriate locations must be avoided or mitigated. Based on the NOP project description and ongoing discussions with the SEC, Project construction activities and operations could have significant adverse impacts on habitat restoration within the Cosumnes/Mokelumne Confluence PHRA. However, the locations of specific facilities that have potential to impact the Cosumnes/Mokelumne Confluence PHRA are not disclosed in the NOP. In the EIR, DWR should disclose whether ancillary facilities will be located within the PHRA and analyze the potential for construction activities and operations of these facilities to result in significant adverse impacts to the opportunity to restore habitat in the PHRA. Proposed mitigation measures should clearly identify how such potential impacts would be avoided or mitigated.

789	Jeff Henderson Delta Stewardship Council	For each resource section in which a Delta Plan policy is applicable, the EIR's description of the regulatory setting should include the Delta Reform Act, the Delta Plan and a reference to the specific applicable regulatory policy or policies. The Council encourages DWR to consider including a section in the EIR that specifically describes alignment with Delta Plan policies, identifying where supporting information can be found throughout the document and supporting appendices.
789	Jeff Henderson Delta Stewardship Council	In addition, information on the Conveyance, Storage, and Operation amendment to the Delta Plan (April 2018) can be found online at http://deltacouncil.ca.gov/pdf/delta-plan/2018-04-26-amended-chapter-3.pdf. This amendment updated Delta Plan Chapter 3 to include new recommendations (Recommendations WR R12a through WR R12j) supporting the concept of dual conveyance that are relevant to the Project. We encourage DWR to review these and incorporate them in the Project and its environmental analysis as appropriate.
793	Rebekah Olstad	The EIR should analyze the cumulative impacts of the Delta tunnels in the context of the new Trump administration Biological Opinions for the Trump Water Plan, the BOR plan to raise Shasta Dam, the long term operations of the State Water Project, and the proposed Sites Reservoir. Would these new projects and rules be used to fill the tunnels? The EIR must analyze the tunnel's cumulative impacts, with particular focus on: ○global climate change impacts; ○ water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; ○ biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; ○ impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and ○ Impacts incurred during construction of the tunnel
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: An adaptive management approach based on established biological goals and objectives that utilizes best available science to evaluate progress towards those objectives. The approach should include a clear decision-making structure through which any changes in approach to minimizing or mitigating impacts to species would ensure that biological objectives are met;
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: Application of best available science and thorough literature reviews to support descriptions of the status of species, known population trends, cumulative impacts to the species from other related projects and activities, Project effects analyses, and mitigation measures; Quantifiable operating criteria that will be used to make decisions about north Delta and south Delta operations and coordination for dual conveyance(in real-time and longer seasonal or annual time steps); Complete descriptions of how the SWP and CVP will continue to operate under the Coordinated Operation Agreement (COA)through joint operations and increased conveyance capacity in the north Delta; Descriptions of modeling assumptions (e.g., CalSim) and rationale for Project operations described in the EIR;

804	Don Hankins, Ph.D.	Prior analyses have all failed to adequately address the ecocultural impacts of such projects, thus this effort should strive to address these deficiencies. First and foremost for any of these projects, the analysis should not be focused on water delivery, rather how can delivery be done in a way that is ecoculturally resilient and sustainable. California's water is highly variable given long-term knowledge and data regarding climate conditions. To understand the ecocultural context of the planning area, DWR should become familiarized with points of analysis noted in Hankins (2018), which discusses many problems related to water management impacts from a tribal perspective. It is recommended that this should be the starting point of this analysis. It is also recommended that the analysis consider testimony provided to the State Water Resource Control Board regarding the point of diversion for the Water Fix as key points for analytical understanding.
853	Susan Alexander	The EIR must analyze the tunnel's cumulative impacts, with particular focus on impacts incurred during construction of the tunnel.
891	Alice Neuhauser	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: ○ global climate change impacts; ○ water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; ○ biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; ○ impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and ○ Impacts incurred during construction of the tunnel and the reservoirs required for water storage.
895	Jorge De Cecco	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: ○ global climate change impacts; ○ water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; ○ biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; ○ impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and ○ Impacts incurred during construction of the tunnel and the reservoirs required for water storage.
953	Jan McCleery	A format that allows the reader to use the table of contents and hyperlink to the related section would be greatly appreciated.
964	Stephen Rosenblum	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: ○ global climate change impacts; ○ water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; ○ biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; ○ impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and ○ Impacts incurred during construction of the tunnel and the reservoirs required for water storage.

966	Du Ng	The EIR must analyze the tunnel's cumulative impacts, including: climate change; water quality degradation, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that will accumulate due to further reduced flow in the Delta; biological resources, including all species and upland habitats that may be affected; tunnel alignmnt's urban impacts for Delta residents.
998	Sean Cudney	My question is "what will the new stand-alone environmental analysis leading to issuance of a new EIR entail"?
1004	Blythe Reis and Mark DuPont	The EIR should analyze the cumulative impacts of the Delta tunnels with the Trump administration Biological Opinion for the Trump Water Plan, the long-term operations of the SWP, the Shasta Dam Raise and the proposed Sites Reservoir. Would these new projects and rules be used to fill tunnels?
1004	Blythe Reis and Mark DuPont	The EIR should analyze the tunnel's cumulative impacts, with particular focus on, global climate impacts; water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta; biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected; impacts on tunnel alignment since the proposed eastern tunnel alignment has potential for significant urban impacts for Delta residents; impacts incurred during construction of the tunnel.

Table D-15. Comments Regarding Mitigation Measures

Letter	Commenter Name, Affiliation	Comment Text
29	Hope Salzer	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term tunnel project.
145	Meredith Cooper	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and include mitigations and protections for every impacted watershed.
195	David Fries Conservation Chair San Joaquin Audubon Society	Monitoring programs must be established and functioning before construction starts and after operation of the proposed conveyance system begins. The project users must accept financial responsibility for all unpredicted consequences of the project.
195	David Fries Conservation Chair San Joaquin Audubon Society	Full transparency of the project planning, construction and operation must be observed. This includes financial costs as well as monitoring and adaptive management events. Monitoring and adaptive management activities must include representation by all stakeholders in the Delta.
241	Ann Dorsey	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term tunnel project.
242	Jack O'Laughlin	There must be a plan to ensure Delta infrastructure will be preserved and improved
246	James R. Sadler	There must be a plan to ensure Delta infrastructure will be preserved and improved
248	Tom Williams	Provide a Draft Mitigation, Monitoring, and Reporting Plan (Program) as part of the DEIR/DEIS, including all related/tiered reporting for the Public and specifically all Public commenters for scoping and DEIR/DEIS review
249	Bryan Griess Transmission Agency of Northern California (TANC)	The following public health and safety mitigation measures will need to be implemented in association with any and all permanent and temporary transmission and distribution line crossings of the COTP ROW proposed as part of the DCP. No transmission line crossings of the COTP ROW will be authorized to be sited in a manner that would place new transmission towers within the COTP ROW. At all locations where proposed transmission or distribution lines to deliver power to the DCP cross the COTP ROW, they shall cross under the COTP conductors. Further, these crossings shall satisfy National Electricity Safety Code and/or California General Order 95 requirements (whichever is more restrictive) for the COTP line under is maximum sag conditions. Access to the COTP facilities for inspection and maintenance, including access for heavy equipment, shall be available al all times during DCP transmission facilities planning, construction and operation. All COTP ROW access roads shall be available at all times for emergency and routine O&M activities. Permanent markers indicating the proximity of energized high-voltage power line conductors shall be required to be furnished and installed on DCP electric transmission facilities before the completion of construction according to standard industry practices for such marker installations.

249	Bryan Griess Transmission Agency of Northern California (TANC)	Should water facility crossings of the COTP ROW be needed, TANC recommends the following mitigation measures for potentially significant soils, drainage and public services and utilities impacts: All temporary earthwork within or adjacent to the COTP ROW shall be designed and implemented in a manner that results in drainage away from COTP transmission tower footings. No cut or fill or cofferdam construction and/or dewatering activities will be authorized that could affect the stability of the COTP transmission tower footings consistent will all applicable government codes. Excavations will not be authorized within 100 feet of COTP transmission tower footings. Residual Tunnel Material and any and all other excavated soil, spoils, or other materials will not be allowed to be placed within the COTP ROW.
265	Molly Culton Sierra Club of California	The EIR must adequately analyze the effectiveness of proposed mitigation in conservation measures over the term of the tunnel project.
274	Mariah Looney Restore the Delta	What is the plan for mitigating harmful algal blooms which cause water quality and air quality problems during construction which will increase in nearby rivers and sloughs as a result of changing flows during construction?
313	Mike Lynes Audubon California	Audubon has long been concerned with the fate of the Delta, as it is home to a strong community of inhabitants, provides a substantial amount of habitat for birds and other wildlife, and serves as a principal conduit of water from northern California to the people, farms, and wildlife refuges south. We understand that the status quo in the Delta is not sustainable and the California's water security depends on improving conditions there. In an Audubon comment letter addressing the Recirculated Draft Environmental Impact Report / Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Bay Delta Conservation Plan (BDCP) / California WaterFix from October 30, 2015, we stated our concerns that the State did not provide adequate assurances that impacts from the WaterFix were fully mitigated. We remain concerned that these issues will be carried over to the Delta Conveyance project. More importantly, in these previous processes the State did not provide adequate assurances that the wildlife habitat, water quality, and human inhabitants in the Delta would be properly attended to once those proposed conveyance projects were constructed; many harbor the reasonable concern that once water conveyance infrastructure is complete, promises of habitat restoration and other benefits to the Delta community will be left unfulfilled.
313	Mike Lynes Audubon California	We understand that while no document will be perfect, there are specific consideration that can be made to the Project and the EIR to provide the public and decision makers with the best and most complete information to understand the Project and provide assurances that its adverse environmental impacts will be mitigated. Perhaps most importantly, these considerations in the EIR's assessment of environmental impacts, including the development of an adaptive management framework, and strong environmental commitments will provide the Delta community and conservation organizations with more assurance that their concerns will not wash out with the tide once the tunnel is constructed and water is flowing freely from north to south.

330	Sharon Jarvis	We're going to have peat dust from the construction. This is not going to go away. It's going to get worse.
332	Earl Jones	It's going to have construction impacts. It's going to damage things as it's built through…
346	Mariah Looney Restore the Delta	If the state insists on the project, there must be equity for Stockton that includes improvement in air pollution and water quality, not just minimum mitigation. Because our people are already starting at an environmental and economic disadvantage. And we're almost the worse in the state. There must be a commitment that is planned now to protect drinking water supply and improve surface water quality conditions for access to recreation for environmental justice communities. But it's questionable that any amount spent will mitigate the impacts on public health and a sustainable economically…
351	Dave Fries National Audubon Society, San Joaquin Chapter	To avoid dissemination of endangered species and threatened bird population, mitigation for lost habitat must be completed and proven effective before construction can start.
351	Dave Fries National Audubon Society, San Joaquin Chapter	Monitoring programs must be established and functional before construction starts. And then full transparency for the project and planning construction and operation must be observed. This includes financial costs, as well as monitoring and adaptive management events. And monitoring of adaptive management must include members of all concerned persons.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and include mitigations and protections for every impacted watershed.
371	Mariah Looney Restore the Delta	Where's the plan for mitigating harmful algal blooms during construction, which will increase in rivers and sloughs as a result of changing flows during construction?
390	Josue Garcia	The EIR also should evaluate impact on the project of using different too– -- tools during construction, including project labor agreements to minimize environmental impacts and maximize benefits, such as shorter construction schedules and labor equity.
412	Peter Anderson	About pile driving, I have worked –I'm a civil engineer' I've worked in construction. I have worked around pile driving when -- you know, for an eight-hour day I was watching pile driving, and at the end of the day, it's stressful. But to have it go 24/7, yeah, that's not-- you can't live near that. In addition, since my house is nearly a hundred years old, like many of the homes here in Clarksburg area, they're built -- the construction is lath and plaster. It's not drywall. And that the vibrations that will occur during that time period will literally disintegrate the connection of the lath and the plaster. And that a large cracking will occur, if not the entire walls. Ceilings will crumble during that construction period making, once again, homes uninhabitable. if my home becomes of no value, you have just put a huge impact on how I'm going to live the last years of my life.

423	Wendy Heaton	I'm a Clarksburg resident, and I live on Merritt Island across from the proposed Clarksburg's intake, and my comments are about construction impacts to residents. First, are wells and pumps: Intake construction involves dewatering, lowering the water table with negative impacts to wells and pumps. Before construction, potentially impacted wells should be inventoried and tested for performance and water quality, creating baseline data. During construction, these wells should be tested and analyzed, again, against the baseline data. And after construction, the project should restore our wells to their pre-construction performance and water quality, and this may require that the project deepens wells or drills new wells. Also, lower water tables will cause pumps to cycle more frequently, with higher electricity costs for residents. Pumps may burn out and need to be replaced due to over cycling. Again, higher costs for residents. These impacts should be analyzed and mitigated. The project should provide replacement water for residents who lose their wells to dewatering. I have concerns also about cofferdams, which will be needed for intake construction. They will impede the flow of the river, and by various regulations, this has to be mitigated. Now, setback levees means removing the homes across the river, and other measures were never identified. Assuming that there are other measures, they should be identified and analyzed. This should also include impacts to the Ag pumps whose intakes run through the levees. Noise from pile driving: Documents from the Stakeholder's Engagement Committee meeting on January 22nd showed that noise levels across the river from the Clarksburg's intake where there are homes, would reach 80 dba or decibels; which the documents say is like being three feet from a garbage disposal. The same document state that by covering the pile drivers, there would be shrouds that they're looking at doing over the pile driving equipment. The noise could be reduced by 10 dba. Bringing the noise to 70 dba, which is like being 10 feet from a vacuum cleaner. So going from a garbage disposal to a vacuum cleaner is some kind of improvement, but it's not something people closest to the project will be able to live with for months and years. So when the Freeport intake was built, people across the river had to be relocated because of the noise. These intakes -- these proposed intakes are each 10 times larger than Freeport. I don't want to move due to construction noise, and my neighbors don't want to move. None of us do. But if these impacts make life impossible, we may have to. And I think that that should be very seriously considered as you go forward with this project.
517	Dan Liveley	You need to mitigate the drain issue because the San Joaquin Valley traps water. With selenium deposits you can’t increase conveyance without fixing the drain.
523	Kristen Olner	Consider environmental adjustments.
549	Maggi Baum	Will we be reimbursed for the loss of trees or loss of crop?
549	Maggi Baum	Where will the tunnel start and how does this affect the properties?

561	Diane Riddle State Water Resources Control Board	The EIR should identify monitoring, assessment, reporting and special studies needed to support construction and operation of the Project to determine compliance with construction and operational criteria, account for and track impacts over time, and answer any management questions. Any new monitoring, assessment, reporting, and special studies should be integrated with and build upon existing water quality and aquatic biology monitoring programs that support the SWP and CVP. Existing monitoring programs, such as the fish surveys conducted by the Department of Fish and Wildlife, water quality compliance and baseline monitoring conducted by DWR, and special studies included in the Interagency Ecological Program Annual Workplan, provide information about the impact of the SWP and CVP on native and migratory fish species, aquatic habitat, ecosystem conditions, and water quality which are important for managing and protecting the estuary and all beneficial uses. Existing programs combined with new monitoring, assessment, reporting and special studies associated with new conveyance facilities should continue to provide information on status and trends in the abundance and distribution fish species and lower food web resources in the estuary.
571	Karen Jacques	The EIR must also analyze the effectiveness of proposed mitigation and conservation measures over the life of the project.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent does the DWR plan to compensate Delta communities for the lost potential income from the exploitation of natural gas deposits in the Delta, made inaccessible due to their proximity to State infrastructure?
598	Bill Emlen Solano County	During Project construction, neighboring levees and residents could be impacted by the construction vibrations, excessive noise, and air pollution caused by the work, including site construction, foundation pile driving, levee road use, slurry injection, and other Project work. Neighboring levees should be retrofitted to withstand the impacts from the Project work and alternatives should be considered to minimize excessive noise, vibrations, air pollution, and other impacts to the neighboring residents andlevees.
610	Henry Kuechler Reclamation District No. 2060	The Delta Conveyance Project should set up an administrative system for hearing and remedying complaints from landowners whose operations are affected by the eventual construction and implementation of the conveyance facilities. These complaints should be addressed with the goal of remediating every financial and other impacts upon all landowners within the district.
610	Henry Kuechler Reclamation District No. 2060	Thirteen years of construction is going to have lasting impacts on agriculture and tourism, which are vital to the Delta as place, one of the co-equal goals of the Delta Plan. There will be direct impacts to businesses and residents in the Delta that must be mitigated to the extent required under controlling law.
612	Warren Bogle Reclamation District 150	The Delta Conveyance Project should set up an administrative system for hearing and remedying complaints from landowners whose operations are affected by the eventual construction and implementation of the conveyance facilities. These complaints should be addressed with the goal of remediating every financial and other impacts upon all landowners within the district.

612	Warren Bogle Reclamation District 150	Thirteen years of construction is going to have lasting impacts on agriculture and tourism, which are vital to the Delta as place, one of the co-equal goals of the Delta Plan. There will be direct impacts to businesses and residents in the Delta that must be mitigated to the extent required under controlling law.
615	Justin Fredrickson California Farm Bureau	The NOP notes the project would require "a series of launch shafts and retrieval shafts," each with a temporary "construction staging and material storage" area of some 400 acres, for an undetermined period of time. Similarly, the proposed intake facilities, forebays, pumping plants, South Delta conveyance facilities, ancillary facilities, etc., would all have their own temporary and permanent footprints and major associated construction related activities, impacting lands and farming operations, roads, residencies and the like, all along the chosen alignment. The EIR for the updated project should look at all feasible means to further avoid, minimize, and reduce such impacts and disruptions, and should carefully consider the comparative effectiveness of the various alignments—including a possible Western Alignment—to achieve this key objective.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether the Project will invest in public facilities and infrastructure throughout the Clarksburg Community, each significant part of the Clarksburg Community, and North Delta to mitigate the impacts of the Project.
627	Nichelle Garcia	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and include mitigations and protections for every impacted watershed.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	Affordability is an issue that affects all, albeit the low income more. Removing more water from the Delta, facilitated by the single tunnel now considered, will increase salt water intrusion and result in lower Delta circulation that is associated with algal blooms including harmful algal blooms (HABs) that increase costs for water treatment. The City of Stockton's primary surface water source is the Delta with treatment at the Delta Water Treatment Plant2. Harmful algal blooms increase treatment cost which would lead to increased water rates for residents within the City of Stockton's Municipal Service Department service area (approximately half of all of Stockton residents). The City of Stockton is in the process of conducting their 5-year water rate study. Stockton has a very low median income (51,3183) as compared with the statewide median income ($71,2284). How will the Delta Conveyance Project funders reimburse the residents of Stockton for higher water treatment costs?

637	Osha Meserve Local Agencies of the North Delta	Adequate mitigation under CEQA must include enforceable mitigation, or an enforceable performance standard is proposed if formulation of mitigation is deferred. My office worked with DWR staff and others on what became the Agriculture and Land Stewardship ("ALS") Framework during the Bay Delta Conservation Plan process. This approach was a step toward in the formulation of mitigation for disruptions of agricultural operations and conversion of agricultural lands to non-agricultural uses. Yet the EIR for the CWF referred to the actions identified in the ALS Framework without committing to any specific mitigation. If it will be relied upon to mitigate the project's impacts, the ALS Framework must include enforceable performance standards, not just provide a menu of options to be selected later.
664	Roberto Valdez	1. The DCP needs to specify, clarify in detail further mitigation measures for potential vernal pool species (Vernal Pool Tadpool Shrimp, California Fairy Shrimp, Longhorn Fairy Shrimp, Vernal Pool Fairy Shrimp, Midvalley Shrimp) as well as Western Pond Turtle & Western Burrowing Owl species which were targeted in defunct Bay Delta Conservation Plan.
664	Roberto Valdez	Due to environmental impacts from anticipated climate change, are targeted & associated species re: DEIR (December 2019, State Clearing House No. 2019039136) going to be monitored every 3-5 years?
675	Terrie Mitchell Sacramento Regional County Sanitation District	The WaterFix diversion structures were characterized by DWR and the SWRCB as "drinking water intakes." If such a characterization were applied to the Delta Conveyance Project and accepted by the RWQCB, it could result in substantial additional capital costs and NPDES permit compliance challenges. Notably, it could lead to the loss of the SRWTP human health mixing zone for the calculation of trihalomethane (THM) effluent limitations. Human health criteria are generally based on long term exposure, and the RWQCB evaluates if the mixing zone meets the requirements of the State Implementation Plan and the Basin Plan requirements to ensure protection of beneficial uses. Due to the location of diversion structures within or near the edge of the current mixing zone, the RWQCB may disallow the mixing zone, requiring Regional San to meet end of pipe THM effluent limitations. This is a very important issue to the successful operation of the SRWTP. Regional San is engaged in a massive effort to design and construct facilities required to comply with its existing permit conditions through its Echo Water project. These new facilities will cost Regional San's rate payers an estimated $2 billion. If the current dilution credit for THMs were eliminated due to concerns regarding the short distance between the edge of the mixing zone and the diversion structures, Regional San could not reliably meet the resulting effluent limitations and would be compelled to cease operation of its new Echo Water project chlorine disinfection facilities. In lieu of chlorine disinfection, Regional San would be forced to construct an alternative disinfection system to meet the THM effluent limitations and Title 22 equivalent requirements in its NPDES permit, leading to additional significant environmental impacts from constructing that system. The EIR Project description should include a commitment that DWR and the State Water Project contractors will not characterize the intakes as "drinking water intakes," and also evaluate the potential adverse impacts to Regional San's operations if the RWQCB were to adopt such a characterization.

677	Jeff McCormack JT McCormack, Inc.	The Law of Unforeseen Consequences should also be considered in regard to the so-called mitigation projects, labelled "habitat restoration projects," which would return our region to swamp. For instance, greater mosquito densities, already a problem with West Nile Virus, and increased spraying required to protect communities; and the subsequent impacts of pesticides on people living along rivers, creeks and marshes.
680	Antal Kalik	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term tunnel project.
683	Jeff McCormack Reclamation District 1002	Thirdly, the mitigation projects of habitat restoration should be re-directed to other areas. Surely habitat acreage is needed in less productive districts, west of the Delta, or in the Sierras, or closer to population centers, so that they do not create such impacts on Agriculture. Past proposals by habitat organizations have threatened that they want to actively flood this reclamation district. Currently the schedule has been adjusted, but that could change with a change in administrations, and we think the Delta Stewardship Council and Legislature should recognize this project as part of their Agriculture-preservation mandate, to justify pushing that initiative away from here altogether.
684	Jeff McCormack John McCormack Co.	Environmental impacts from mitigation projects due to your construction project should also be included. Increased flooding from "habitat restoration" projects in the Cosumnes River floodplain that overflow further than planned, into our property should be documented as potential impacts, and prevention funding with improved levees designed in to project costs as mitigation.
698	Steve Lambert Butte County Board of Supervisors	The BDCP/WaterFix ignored fundamental state water policies, disregarded area of origin water rights, violated the water right priority system, and redirected impacts to the northern Sacramento Valley. The DCP must honor the water right priority system, area of origin water right and not redirect impacts to northern Sacramento Valley.
705	Roger Mammon	Will damage from salt water intrusion be mitigated and how?
706	Shelley Ostrowski Westlands Water District	From these past efforts, it is clear that the Proposed Project may impact CVP operations, including operations of the Jones Pumping Plant and San Luis Reservoir and have environmental impacts in the CVP service area. As a result, DWR must: (3) mitigate the resulting environmental effects.
707	David Mooney Bureau of Reclamation	Reclamation requests the following: a clear delineation between the existing biological monitoring requirements within the Delta and the monitoring requirements resulting from changes in system wide programs due to the addition of the Delta Conveyance Project
708	David Mooney Bureau of Reclamation	Given the coordinated nature of the Central Valley Project (CVP) and the State Water Project (SWP), Reclamation requests that DWR take all measures to avoid, mitigate, or offset potential Delta Conveyance Project impacts to the CVP. Potential impacts include annual and daily operations of the Delta Conveyance Project that negatively impact CVP water and power operations, any restrictions or financial commitments imposed on the CVP through permits or other regulatory approvals issued for the Delta Conveyance Project, and biological impacts attributable to the Delta Conveyance Project.

711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Agricultural damage. Crop damage is a tremendous concern for farmers. Delays on the road with traffic, construction stops, rough unmaintained detour roads or rough construction zone roads, and longer routes will impact the quality of the crops. Too much damage from bruising, extended sunlight on the top layer, and excessive heat buildup will quickly turn high quality produce into worthless culls and a loss financially for the farm and family. Many residents in the Delta depend on the harvest of the Delta crops to support their family. Whether a farm owner or farm laborer, the success of the harvest affects their paychecks. Even the increase of greenhouse gases can impact the quality by ripening some of the fruit faster. The EIR needs to address mitigation for harvest time. Major crops include cherries and wheat in May and June, blueberries in May to July, pears and apples in July and August, alfalfa hay from May to October, wine grapes and corn in September and October, almonds in October and November and much more.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Delta river pumps. Extensions and/or additional pumps will need to be included in the EIR mitigation along with their greenhouse gas emissions. Identical to the previous versions of this project, the result will be pulling water out of the river at a northern point which will result in the lowering of the river water level. The projected drop in water level was 1-2 feet and with most of the Delta holding riparian rights, issues with the water level below those pump intakes will need to be addressed and mitigated. When a salinity barrier was being proposed for Steamboat Slough and that water would drop 18", the State realized that they couldn't just place a separate temporary pump line over the levee for a few months as they could on other islands since the road was a public road. If that barrier had been put in, they would have had to come in and extend the river side pipe to lower the pump intake. We request that the EIR include the mitigation costs for the pump extensions for all the Delta water users' thousands of pumps.
714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and include mitigation and protection for every impacted watershed.
715	Daniel Wilson Reclamation District 3	The Delta Conveyance Project should set up an administrative system for hearing and remedying complaints from landowners whose operations are affected by the eventual construction and implementation of the conveyance facilities. These complaints should be addressed with the goal of remediating every financial and other impacts upon all landowners within the district.
715	Daniel Wilson Reclamation District 3	Thirteen years of construction is going to have lasting impacts on agriculture and tourism, which are vital to the Delta as place, one of the co-equal goals of the Delta Plan. There will be direct impacts to businesses and residents in the Delta that must be mitigated to the extent required under controlling law.

718	David Strecker San Joaquin Farm Bureau Federation	Agricultural damage. Crop damage is a tremendous concern for farmers. Delays on the road with traffic, construction stops, rough unmaintained detour roads or rough construction zone roads, and longer routes will impact the quality of the crops. Too much damage from bruising, extended sunlight on the top layer, and excessive heat buildup will quickly turn high quality produce into worthless culls and a loss financially for the farm and family. Many residents in the Delta depend on the harvest of the Delta crops to support their family. Whether a farm owner or farm laborer, the success of the harvest affects their paychecks. Even the increase of greenhouse gases can impact the quality by ripening some of the fruit faster. The EIR needs to address mitigation for harvest time. Major crops include cherries and wheat in May and June, blueberries in May to July, pears and apples in July and August, alfalfa hay from May to October, wine grapes and corn in September and October, almonds in October and November and much more.
718	David Strecker San Joaquin Farm Bureau Federation	Delta river pumps. Extensions and/or additional pumps will need to be included in the EIR mitigation along with their greenhouse gas emissions. Identical to the previous versions of this project, the result will be pulling water out of the river at a northern point which will result in the lowering of the river water level. The projected drop in water level was 1-2 feet and with most of the Delta holding riparian rights, issues with the water level below those pump intakes will need to be addressed and mitigated. When a salinity barrier was being proposed for Steamboat Slough and that water would drop 18", the State realized that they couldn't just place a separate temporary pump line over the levee for a few months as they could on other islands since the road was a public road. If that barrier had been put in, they would have had to come in and extend the river side pipe to lower the pump intake. We request that the EIR include the mitigation costs for the pump extensions for all the Delta water users' thousands of pumps.
720	Eric Gillies State Lands Commission	Deferred Mitigation: In order to avoid the improper deferral of mitigation, mitigation measures must be specific, feasible, and fully enforceable to minimize significant adverse impacts from a project, and "shall not be deferred until some future time." (State CEQA Guidelines,§15126.4, subd. (a)). All identified mitigation measures included in the Draft EIR should comply with the State CEQA Guidelines, as noted above.
721	Michael McDowell Double M Farms	The EIR needs to address mitigation for harvest time. Major crops include cherries and wheat in May and June, pears in July and August, alfalfa hay from May to October, wine grapes and corn in September and October, and much more. Thousands
721	Michael McDowell Double M Farms	Extensions and/or additional pumps will need to be included in the EIR mitigation along with their greenhouse gas emissions.
721	Michael McDowell Double M Farms	I request that the EIR include the additional greenhouse gas emissions from the additional required pumps and pumping time that will be needed to water crops due to the river water table drop that will result from this project.
721	Michael McDowell Double M Farms	I request the EIR to address mitigations for preventing the inflow of salinity farther into the Delta.

721	Michael McDowell Double M Farms	I request mitigation measures to be included in the EIR for providing a permanent source of clean, domestic drinking water to residents in each affected Delta town.
729	Erik Vink Delta Protection Commission	Treat Us as Well as Other Californians Measures to mitigate impacts in the Delta must be at least equivalent to those used in other large public works projects in southern California, Santa Clara County, and the San Joaquin Valley that would receive water through the proposed tunnel. These regions have employed both practical and innovative ways to reduce and offset the damaging effects of public works projects. Homes have been insulated to quiet excess noise. State-of-the-art equipment has been used to reduce disruption during construction. Homes that must be purchased are subsequently replaced and made available at affordable prices. Historic structures have been carefully mothballed and then rehabilitated after project completion. Funds have been provided to help adversely affected businesses persist despite the disruptions caused by project construction. The application of such measures elsewhere in California demonstrates that they can typically be accomplished successfully, considering economic, environmental, social and technological factors. The EIR must evaluate such measures applicability in the Delta and adopt them whenever feasible.
729	Erik Vink Delta Protection Commission	Make Delta reclamation districts whole. DWR and the DCA should be held to the same standard that DWR and the CVFPB apply when encroachments affect their levees and drainage works. For example, DWR/DCA should pay local reclamation districts an inspection fee to cover inspection costs, including staff and/or consultant time and expenses, for any inspections before, during, post-construction, and regularly thereafter as deemed necessary by the reclamation district. DWR/DCA should agree that, in the event that levee or bank erosion injurious to a reclamation district's facilities occurs at or adjacent to the project, it will repair the eroded area and propose measures, to be approved by the reclamation district, to prevent further erosion. DWR/DCA should be responsible for the repair of any damages to levees, channel, banks, drains, siphons, or other reclamation district facilities due to construction, operation, or maintenance of the proposed project. DWR/DCA should agree to defend, indemnify, and hold harmless affected reclamation districts against all claims, liabilities, charges, losses, expenses, and costs (including their attorneys' fees)that may arise from the project. If any claim of liability is made against a reclamation district, DWR/DCA should defend and hold them harmless from any claim.
730	Reclamation District 551	If any Delta Conveyance Project facilities are located on Pearson District, a sizable portion of the District's existing drainage canals and some components of the pumping stations will need to be reconfigured and relocated. The existing system has been in place for over 100 years, and takes advantage of natural land contours to provide the most efficient drainage possible. DWR will need to meet with the RD 551 trustees and engineering staff in order to design the new system modifications, which may require acquiring additional easements or real property as any new ditches or other facilities will need to cross private property and potentially pumping upgradient in some areas. The Delta Conveyance Project will need to pay for all costs associated with modifications to the drainage system, including the costs of design, engineering, construction, and equipment, and any increased costs in pumping.

730	Reclamation District 551	RD 551 engineering staff will require a significant amount of time to review the proposed tie-ins and/or encroachments upon the District levees, and to propose comments and conditions, all for the purpose of avoiding third-party effects upon district operations and the significant environmental impacts that could otherwise result. As with any other encroachment upon the district works, RD 551 will look to the Delta Conveyance Project to pay for the hourly cost of RD 551's staff time in conducting this review.
730	Reclamation District 551	Thirteen years of construction is going to have lasting impacts on agriculture and tourism, which are vital to the Delta as place, one of the co-equal goals of the Delta Plan. There will be direct impacts to businesses and residents in the Delta that must be mitigated to the extent required under controlling law.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must analyze whether the Project will invest in public facilities and infrastructure throughout the District, the Clarksburg community, and the North Delta, to mitigate the impacts of the Project.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	Construction methods must be analyzed, and alternative construction methods must be utilized, as demonstrable mitigation, which will not damage the Old Schoolhouse.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must analyze whether the Project will invest in public facilities and infrastructure throughout the Clarksburg community, and the North Delta, to mitigate the impacts of the Project.
733	Tom Williams	Provide draft Mitigation, Monitoring, and Reporting Plan and assure that quarterly reporting shall be done until operations begin.
733	Tom Williams	Provide an updated draft of the MMRP with the staged assessment and mitigation for the proposed Project
733	Tom Williams	Provide a Draft Mitigation, Monitoring, and Reporting Plans with specific provision for publicly accessible reporting and coordination with the Public.
734	Richard Denton	The EIR must fully mitigate any significant water quality impacts of the proposed project
743	The Environmental Council of Sacramento	Impacts to Stone Lakes National Wildlife Refuge need to be avoided Because of the sensitive nature of the Refuge, the project needs to do its utmost to avoid impacts to the refuge. This includes avoiding infrastructure placement in the Refuge as well as roads and transmission lines. The EIR needs to identify how to avoid these impacts in the Refuge.
746	Friends of Stone Lakes National Wildlife Refuge	WaterFix environmental commitments must be included as part of project. The WaterFix tunnel project included a number of environmental commitments that were a product of extensive discussions with stakeholder groups associated with Stone Lakes NWR. These measures provided significant mitigation for impacts on terrestrial species, most notably greater sandhill cranes and Swainson's hawks. These environmental commitments must be included as part of the project, preferably as mitigation measures for the current tunnel project.

773	Contra Costa Water District	Pursuant to the March 2016 settlement agreement between DWR and CCWD, DWR identified construction and operation of Interconnection Facilities – facilities to convey water from the BDCP/CWF conveyance system to CCWD's water supply system – as mitigation measures in the Final EIR/EIS for the BDCP/CWF and included an evaluation of the environmental effects of such mitigation in the Final EIR/EIS. As the Delta Conveyance Project is the replacement of the BDCP/CWF, CCWD anticipates that DWR again will identify construction and operation of the Interconnection Facilities as mitigation measures in the Delta Conveyance Project Draft EIR and will include an evaluation of the environmental effects of such mitigation in the EIR. CCWD staff are available to assist in this assessment.
776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	As described in the NOP, the project would promote new habitat restoration projects as mitigation for removing more freshwater from the estuary. However, the new allocations may reduce flows to the Bay and Suisun Marsh before the new habitat is established and mitigating the impacts of reduced flows. To remove the water first, before the new habitat is established, would require current species to survive on less than the current allocations, which already have reduced some population numbers to nearly undetectable levels. If restoration projects cannot be established prior to the project becoming operational, then the agreements and standards should have contingency plans should the habitats not serve to promote species welfare as designed. The DIER should reference peer-reviewed scientific analysis in developing alternatives should the proposed restoration and mitigation habitat not fulfill the desired outcomes.
781	Janet Wall Wintu Audubon Society	The EIR must analyze the effect on habitat for flora and fauna "upstream" and "downstream" during construction and over the life of the project. The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy G P1, subsection (b)(2) (Cal. Code Regs., tit. 23, § 5002, subd. (b)(2)) requires that actions not exempt from CEQA and subject to Delta Plan regulations must include all applicable feasible mitigation measures adopted and incorporated into the Delta Plan as amended April 28, 2018, or substitute mitigation measures that are equally or more effective. Mitigation measures in the Delta Plan's Mitigation Monitoring and Reporting Program (Delta Plan MMRP) are available at: https://www.deltacouncil.ca.gov/pdf/delta-plan/2018-appendix-o-mitigation-monitoring-and-reporting-program.pdf. If the EIR identifies significant impacts that require mitigation, Council staff recommends that DWR review the Delta Plan MMRP and, when feasible, apply the mitigation measures adopted and incorporated into the Delta Plan. Given the scope of the Project, it appears likely that numerous mitigation measures would be relevant.

789	Jeff Henderson Delta Stewardship Council	In addition, as part of the previous WaterFix project, DWR committed to "the implementation of a Community Benefits Fund, or its equivalent. This fund would incorporate good neighbor policies to avoid negative impacts on agricultural lands, residents and businesses by providing a mechanism for communication with local government and community members and disburse funds to protect and enhance the Delta as an evolving place." (DWR Certification of Consistency for California WaterFix, DP P2, pp. 21-22). The NOP does not describe a similar mechanism as part of the Project. If such a fund is proposed as part of the Project or as mitigation for potentially significant or significant impacts, it should be described in the EIR and in a future certification of consistency. DWR should describe how the fund would be managed and administered, how fund expenditures would reduce significance of Project impacts contributing to conflicts with existing land uses, and how the fund would constitute an enforceable commitment to reduce such impacts.
793	Rebekah Olstad	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and include mitigations and protections for every impacted watershed.
796	Byron Nelson, Jr. Hoopa Valley Tribe	Specific examples of protective and restorative measures that the EIR should evaluate and ultimately adopt include : Full funding and implementation of actions under the 2000 ROD. Augmentation of flows beyond the requirements of the 2000 ROD as necessary for preservation and propagation of fish in the Trinity and/or Klamath Rivers when conditions warrant. Coordinating and integrating operation of CVP/TRD operations with the Klamath Irrigation Project in a joint directorate with the Tribe. Funding and developing infrastructure to establish and maintain temperature of water releases from TRD facilities suitable for fish and wildlife preservation and propagation. Upgrading the TRD hatchery facilities and funding the Tribe's plans for additional selective harvest; Transferring management of TRD hatchery to the Tribe. When called upon by the Tribe as a third party beneficiary of the June 19, 1959 contract between the United States and Humboldt County for annual release of 50,000 acre-feet of TRD water for: (a) facilitating economic development of the Hoopa Valley Reservation; and (b) fishery preservation and propagation activities in addition to those provided for with Proviso 1 TRD water. Accumulating and maintaining in TRD carryover storage for use in the Trinity/Klamath basin for beneficial uses, up to 150,000 acre-feet of Proviso 2 water. Facilitating lease or exchange of Proviso 2 water in carryover storage to CVP contractors and the State Water Project on terms acceptable to the Tribe .

822	Karen Coffee	Re Property located at 36560 Riverview Drive, Clarksburg, CA 95612. Because of its location on the main channel of the Sacramento River and reliance on the levee for my home's survival, the proposed Delta Conveyance Project as described in the NO“ ("Project”) presents a series of substantial direct and indirect effects (including environmental effects), socioeconomic effects, and cumulative effects on this home. The historically significant house is a fragile structure, vulnerable to the effects of heavy construction pounding and other consequences anticipated to be employed to construct the Project. As an example of direct impact, it can be anticipated from the NOP that the heavy construction methods required for the construction of the Project will cause accelerated deterioration of the west bank levees, thus further endangering the lives of individuals living around or near the project, including this house, and greatly increasing the damage to the structure. Significant movement of large amounts of already unstable soils may also have unanticipated negative consequences. Construction methods must be analyzed, and construction methods must be utilized, as mitigation, which will not damage this or any local property.
822	Karen Coffee	Construction methods must be analyzed, and alternative construction methods must be utilized, as demonstrable mitigation, which will not damage my home at 36560 Riverview Drive, Clarksburg, CA 95612 in any significant way.
822	Karen Coffee	Re Property located at 36560 Riverview Drive, Clarksburg, CA 95612. Whether, and how or how-not, the Project will benefit me personally. Whether, and how or how-not, the pre-construction, construction, operations and maintenance of the Project will have a substantial impact on the views from my house at 36560 Riverview Drive, Clarksburg, CA 95612. Whether, and how or how-not, alternative locations for the proposed intakes, and all other proposed components of the Project, would lessen impacts on my house than the currently proposed northernmost proposed intake. Show how sites, other than each of the three proposed intakes, considered by the Fish Facilities Technical Team were determined to be less impactful on my house. Whether, and how or how-not, the Project will enhance and protect my house (Public Resource Code § 85054). State and analyze the socioeconomic impacts of the Project on me and the future value of my house.
853	Susan Alexander	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and include mitigations and protections for every impacted watershed.
891	Alice Neuhauser	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term tunnel project.
895	Jorge De Cecco	The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term tunnel project.
1004	Blythe Reis and Mark DuPont	The EIR should analyze the effectiveness of proposed mitigation and conservation measures over the term of the tunnel project, and including mitigations and protections for every impacted watershed.

Table D-16. Comments Regarding Water Supply

Letter	Commenter Name, Affiliation	Comment Text
50	Michael Tognolini East Bay Municipal Utility District	EBMUD's main water supply is the Mokelumne River. Water is conveyed from the Mokelumne River to EB'UD's service area via the Mokelumne Aqueducts, which traverse a distance of approximately 90 miles from Pardee Reservoir in the east to Walnut Creek in the west and deliver much of EB'UD's water supply. These aqueducts cross directly through the Delta on land owned in fee-simple by EBMUD (Mokelumne Aqueducts Right-of-Way (ROW)). In their east-west crossing of the Sacramento-San Joaquin River Delta (Delta), the Mokelumne Aqueducts pass over Lower Roberts Island, Jones Tract, Woodward Island, and Palm-Orwood Tract. Please see Attachment 1 for a map of the route of the Mokelumne Aqueducts. As the Department of Water Resources (DWR) is well aware, EBMUD is planning its own tunnel through the Delta, following the current EBMUD Mokelumne Aqueduct alignment. Figure 1 of the NOP depicts the "Proposed Project Facility Corridor Options," showing two potential tunnel corridors that the Project would use to convey water from the northern Delta to the export pumps in the southern Delta. Either of these identified tunnel corridors would intersect with the Mokelumne Aqueducts ROW as it crosses the Delta from east to west.
50	Michael Tognolini East Bay Municipal Utility District	We expect DWR to fully assess and mitigate any potential impacts that the Project could have on any aspect of EB'UD's integrated resource actions and the exercise of its water rights and entitlements.
115	Susan Simpson	There will be no more water. This isn't a magic pill, creating more water for the almond growers, Big Ag or thirsty Southern California communities.
131	Felice Pace	Analysis of Delta Conveyance impacts should include: Assessing and disclosing whether the current available water supply is sufficient to provide water for export via the conveyance in dry, very dry and drought years.
140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	The opposition is based on the project's potential to: • Export volumes of water that exceed the health and human safety needs of the south of Delta population. o AB 685 (2012) and SB 200 (2019) refer to the right of every Californian to have access to safe drinking water. o Current and projected future Delta water transfers far exceed the drinking water demands for the south of Delta population. o Water districts in the water rich regions of the state, have been forced to reduce the water demands of our customers; therefore, the south of Delta population (living in water short regions) should be under even higher conservation standards. ▪ What is the rational for residents in southern California receiving a larger water budget than northern California residents? ▪ Current state regulations, including the Model Water Efficient Landscape Ordinance, reward poor plant selection in Southern
143	Paul Anderson	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of the water in the Delta.

151	Felice Pace	The EIR MUST Fully describe potential future actions that will be necessary to feed the conveyance (to use its capacity) including under climate change scenarios.
152	Patrick Nolan	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of the water in the Delta.
157	Julie Fouquet	It must also address the threats that climate change and increased water transfer pose to the amount and quality of the water in the Delta.
165	David Mackler	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of the water in the Delta.
198	Laura Schneider	In what way will the building of the tunnel change the flow of water through Snodgrass Slough?
204	Raven Stevens We Advocate through Environmental Review (WATER)	The EIR must analyze how district 1 benefits by the shipping of water out of our area to the South. What are the real time mitigations in place to support the Water Recharge Areas, where water is sourced?
204	Raven Stevens We Advocate through Environmental Review (WATER)	In the EIR, you must include how this project works when there is less recharge water flowing into these river systems. If the Delta Tunnel goes online, it must "take less" water according to the amount flowing in, just like other users must "take less".
208	Morgan Lindsay	Fully study the effects of this project, including negative effects, to river, salmon and natural ecosystems of all upstream river basins. Divert less water and keep more water in the river.
210	Anna Powell	Trinity River will have direct, not indirect impacts, as water is pumped through Sacramento River via tunnels
216	Jenny Staats	Analyze impacts to source water and reservoir storage, including Trinity, Klamath, Sacramento, Feather, Yuba and San Joaquin Rivers
218	Gino O'Rourke	Water already taken from Klamath. Flows depleting salmon populations.
227	Franz Steiner	The Tunnel reduces the net water outflows to the lower delta and the bay area.
248	Tom Williams	Provide thorough, complete, and quantitative impact assessment and mitigation for areas receiving any significant derived project waters (e.g., >10 acre-feet/year) and incorporate California Dept. Finance projections with and without such project waters to 2045 (using 2020 census).
251	Loren Rhodes	With what water will future Delta tunnel and dams and reservoirs be able to operate?
255	Sandy Rhodes	With what water will future Delta tunnel and dams and reservoirs be able to operate?

256	Heinrich Albert Friends of the River	I'm speaking today on behalf of Friends of the River. Will this project result in additional diversions from the system? I think that that is really a key question. Previous incarnations of around or under the Delta conveyance have advertised that, "Oh, no, this is just for reliability. No more water is going to be taken out of the system." I understand that recently the state water project contractors got rid of this reliability fig leaf, which I think a lot of us were always skeptical about anyways and are only going to pay if there is a promise of more water for them. Now, given the situation that there is tons of independent science that says that the Delta, through the Delta, downstream of the Delta and the tributaries of the Delta need greater flows in order to protect the native fish and other riparian species that are dependent on those environments, using this project to divert more water, I think is unconscionable. Really, this cannot happen. This is just putting another nail in the coffin of this critical environment. And you mentioned the existing -- the Endangered Species Act and biological opinions as things that will limit the amount of water that will be taken out. But given what the Trump administration is doing, and unfortunately, the state's failure so far to act to oppose those biological opinions in court, you know, that first that came out, but then Westland said“, "No, no, no. don't do that." And I don't see it happening. So given that, and given DWR's recent proposal for additional pumping from the Delta, there is nothing to stop just huge diversions from this system, greatly increased diversions when it's so clear and our own state water board has made it so clear, we need greater in stream flows, we need greater flows through the Delta, not less. Well, what I'm trying to say really quickly, we're doing things out of order. It does not make sense to invest in tunnels that have greater capacity than what they can actually transmit in an environmentally sound way. To say we're going to wait on the operations plan until we've already got this investment is not realistic to think we're going to build a big tunnel, but we'll only use a little bit of it.
276	Emily Moloney Buena Vista Rancheria of Miwok Indians	We are concerned about water quality and quantity. The new intakes are going to potentially pump 6,000 cfs. The Sacramento River discharges, it varies throughout the year, and during low flows in the late summer and fall can reach as low as 2,000 cfs. This is an overdraft of the Sacramento River. This needs to be seriously considered as if we are not going to have sufficient freshwater flows into the Delta, we’re going to have increased toxicity in our Delta, increased salinity, heavy metals, pesticides, herbicides. We’ll probably have reduced dissolved oxygen and we will be causing an overall tipping of the ecological thresholds away from resiliency and sustainability.
292	Bruce Campbell	Evaluate each alternative in regards to water security, water quality and water quantity for Southern California water consumers.
300	Kendal Asuncion Los Angeles Area Chamber of Commerce	Moreover, many of our regional efforts to develop and improve local water supply, like waste water recycling, groundwater banking, and desalination, rely on imported water.
301	Steve Arakawa Metropolitan Water District of Southern California	Southern California’s $1.6 trillion economy depends on reliable supplies from the State Project as part of its diverse water supply strategy. In an average year, we can get to about 30 percent of its water from the State Project, and it's a vital lifeline for homes, businesses, communities, agriculture, and our environment.

301	Steve Arakawa Metropolitan Water District of Southern California	Metropolitan and its member agencies are hard at work to develop these types of supplies locally. That includes groundwater/storm water recapture. Obviously, water conservation is the California way of life that we all are committed to, but having that high-quality water from the State Project in the volumes that we have today and protecting that is critical to expanding our local supply . So a modernized State Water Project is really key to our future.
301	Steve Arakawa Metropolitan Water District of Southern California	The State Project not only represents one of our most important sources of water, but also one of the most affordable, particularly for our rate payers that are from disadvantaged communities.
304	Ken Raush El Monte/South Monte Chamber of Commerce	The chamber knows that Metropolitan's service area contains close to 20 million inhabitants and that it fuels an annual $1.6 trillion economy. The Delta, where 30 percent of our water supply passes through before being pumped to our businesses, groundwater basins, reservoirs, farms, and homes, is in serious need of investment and upgrades. Without these investments, the water will continue to decline over the coming years because of continuing environmental deterioration and subsequent restrictions.
305	Derek Ryder	Why the proposed tunnel, the Sacramento Delta, and So Cal's water supply is important to me. I've lived and worked on both sides of the aqueduct that would carry the additional 6,000 cubic feet per second. I grew up in the foothills above Sacramento and worked as a rafting guide on the American River during college where I saw the value of a healthy river ecosystem and of a jobs-rich tourist industry.
310	Charles Wilson Southern California Water Coalition	The ability to move water when it is abundant is important. I also wanted to make sure that I shared this with the Delta Stewardship Council -- this issue about Southern California and its resiliency. We've been spending, for the past 25 years, on average $2 billion annually around recycling, around storm water, around efficiency, around conservation. This is not new to Southern California. There are parts of the state that this would be new to, but we've made the investment . We will continue to make additional investments. We will do so. But the fresh water supply that comes from the project that you are considering is the base supply that makes all of that possible. Without that 30 percent, we have fundamentally changed how we will do things in Southern California at exponentially higher costs .
328	Niria Alicia Garcia	It's very sad that water continues to be stolen from the northern watersheds for the benefit of big GMO farmers and oil companies that continue to frack.
332	Earl Jones	...It does no good whatsoever unless it's used; and beyond that, used to a substantial amount of its capacity. And we don't know right now whether that water is going to be there and whether it's most efficient -- whether the most efficient use of the water that is there is for wasteful agricultural practices and/or wasteful residential use.
333	Roger Kelly	We can't afford to give up any more water.

335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	Specifically, we do not see that real limits have been placed on the amount of water to be exported. In recognition of the fact that the state has approved at least five acre feet of consumptive water rights claims for every acre foot of unimpaired flow in the Sacramento and San Joaquin River basins, under these circumstances, protecting existing supplies consistent with existing water rat– -- water rights is not a sustainable strategy.
341	Dante Nomellini, Sr. Central Delta Water Agency	The projects have been operating for 70 years, running water through the channels of the Delta. The problem has developed to try and take more water than the system can provide. And the law is clear, that the areas of origin are entitled to recapture the water from the projects as demand develops. So the water supply available to the projects is going to diminish over time.
342	Darius Waiters	And now the water right from the tips of our tongue, minority cultures have always been parched. Why do you think we learned to rain dance? Why do you think our throats are cracked and dry screaming for equity and the right to be heard? Do the greedy possess no ears, no hearts?
343	Margo Praus Sierra Club of California Member	For years, California has had a long history of redistributing water in the valley. Our waterways and our groundwater have been heavily impacted. And we see this constant like surface water that has been over allocated. Doesn't matter what the voluntary agreement says. It's been over allocated, and groundwater has been depleted.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the impacts to watershed source waters and their reservoir storage, including the Trinity, Klamath, Sacramento, Feather, Yuba, American, and San Joaquin rivers. Water quality impacts from any increased diversions must be included in this analysis.
361	Brett Baker	Before going with this project, you should 13 definitely conduct a water availability analysis.
381	Peter Stone	Potential Environmental Effects: There are 23 listed, but they don't explicitly include construction impacts or ultimate direct impacts on residents of the Delta -- and it must. Attempting to dewater 190 feet down will have significant collateral impact for the residential drinking water wells around the tunnel and digging sites.
381	Peter Stone	Unlike the prior project, it must be unacceptable in the EIR this time that it is assumed that some people will have to abandon their homes, clearly without any compensation. Wells within an appropriate distance, a mile or two, or whatever, must be tested and documented before work begins so that damage, if any, can be clearly seen afterwards. Loss of drinking water during nine years of construction and/or permanently for residences is not acceptable. If property or its use is to be taken, or assumed that individuals will abandon their property, it should be taken by eminent domain, not effectively confiscated. Mechanism for unhanded takes, compensation should be built in and not requiring people to sue the state.
408	Allie Rosenbluth Rogue Climate	Your EIR must include the impacts to the Trinity and Klamath Rivers, the communities who depend on the waters & salmon, and how this project would add additional stressors to all of these rivers in the era of the climate crisis. Your EIR must also include impacts to all of the fisheries up and down the West Coast because we know that impacts to one fishery can have far reaching impacts on commercial and indigenous fisheries on our coast.

412	Peter Anderson	The house I live in is one of the few homes that actually sits on top of the levee here in the Clarksburg area. And as it was mentioned about the dewatering, yes I'm absolutely positive that if the project was constructed outside of my front door, that my home would not be inhabitable. There would be no water available.
473	Luda Miller	These waters that you're proposing include increase 6,000 cubic feet per second downstream. That means on an average in the Summertime rather than 9,2– -- 13,000 cubic feet per second, which are the contract requirements today, that it will be 15 to 18,000 cubic feet per second. Where do you think the water is going to come from?
475	Susan Murray	A few years ago we had a drought situation, and we had to watch our water consumption. What's going to happen when -- because they are going to be moving 6,000 cubic feet per second down the river, what's going to happen if we are in a drought position again? What's going to happen to our water here (Northern California) when we're sending it down south?
500	Heinrich Albert	The fact that there are no clear limitations to the amount of water that will be diverted by this system I think poses a great threat to our salmon that depend on the Cosumnes and depend on all of the other tributaries that feed into the Delta. You mentioned we don't have hard, fixed operations because there might be last-minute changes that are required by the fisheries agencies. I think that's an important consideration, but given the all-out assault that is coming from the Trump administration on the biological opinions, that limit the amounts that can be diverted, I don't think that that is a reliable way to assure that we don't be taking too much water out of the system. We need more water in the system, not less. Not more diversions.
505	Lenora Clark	We are concerned with the lack of surety that the plan will address increased water transfer.
517	Dan Liveley	The Delta is overallocated. There just isn’t that much water in most years. This is an overallocation without mitigation. Fisherman are only asking for 5 or 10 of river flows. If we get 5 to 10 percent overflow, we can restore fishing in the Delta and maintain the Delta.
519	Mike McCleery	We are going to be impacted by water supply.

552	Nicole Suard Snug Harbor Resorts	To date, it can be shown that there are insufficient functioning monitoring stations within the Delta and in many areas of the Sacramento River watershed to be able to provide accurate reporting of current flows and water quality. The California Water Portfolio developed over the last year is a good effort but for some areas, like the Delta, outdated and verifiably incorrect data was used regarding flows and diversions from the Sacramento River watershed. Based upon the declining condition of rivers and streams of the Sacramento River watershed and the Delta, and the fact that the Delta drinking water aquifer appears to be in the process of active degradation due to a lack of annual sufficient fresh water flows through the Delta waterways for at least the last 15 years, diversions into SWP existing conveyance and storage facilities should be immediately curtailed until the drinking water and surface water quality in the Delta recovers. Prior to building any new conveyance facilities, as part of the required research and reports needed to validate modeling impacts assessments, the state needs modern, accurate flow and water quality stations to be installed at several locations on each of the Delta waterways, to better track flows, diversions and real time water quality of each of the waterways. Installation of the monitoring stations, reporting online and maintenance of the data and online resources should be done by an agency independent of influence by DWR/SWC; such as an agency or organization dedicated to protecting the water quality of the entire Delta region and Sacramento River watershed.
561	Diane Riddle State Water Resources Control Board	Construction of the Project requires modifications to water rights to add points of diversion and re-diversion of water. In order to approve a change in a water right permit or license, the State Water Board must find that the change will not injure any legal user of water or unreasonably affect fish and wildlife. The EIR should fully analyze and propose measures to address any potential impacts of the Project on other legal users of water. The EIR should evaluate whether and how the Project may affect specific surface and groundwater diversion facilities, salinity levels, residence times (that may affect aquatic vegetation and harmful algal growth and proliferation),water elevations, and dissolved oxygen levels, which may in turn affect legal users of water. CEQA does not specifically require analysis of impacts to other legal users of water; however, the State Water Board will rely, if possible, on the EIR to support decisions regarding the addition of points of diversion to existing water rights. If this information is not available in the EIR, the State Water Board may request additional information outside the CEQA process in order to meet its obligations under the Water Code and other applicable legal authorities.

561	Diane Riddle State Water Resources Control Board	The proposed new North Delta intakes would both provide more diversion capacity and remove existing constraints on SWP and possibly CVP diversions, such as Old and Middle River flow and San Joaquin River flow to export ratio constraints(Inflow to Export or I:E), allowing for greater diversions than currently allowed. The EIR should analyze and disclose the potential effects of this increased diversion capacity assuming existing and future levels of demand. The potential for use of this additional capacity by other water users should also be fully evaluated, including increased use of joint points of diversion (JPOD), utilization of spare wheeling capacity by the CVP, and use of the new facilities for additional water transfers. The EIR should also evaluate reasonably foreseeable increased demands for water for groundwater banking, conjunctive use, and south of Delta storage.
576	Kelley Taber Sacramento County Water Agency	The location and operation of the Project intakes presents the potential for significant adverse impacts to Sacramento County Water Agency's operation of the Freeport Regional Water Project from reverse flow events in the Sacramento River, and to the Sacramento region's water supply, through impacts to surface and groundwater quality and availability (including groundwater levels during construction and operation in the Project area and South American Sub-Basin) and changes in upstream reservoir operations and in river flows in the Delta and upstream tributaries.
576	Kelley Taber Sacramento County Water Agency	The Project has the potential to threaten the availability and reliability of SCWA's water supplies through changes in CVP operations that can result in lower storage levels in Folsom Reservoir in certain dry years. Reduced storage and surface water deliveries to SCWA could also require an increase in groundwater production from the South American Sub-Basin in order to meet Zone 40 demands. The electronic modeling files prepared by DWR and Reclamation as part of the WaterFix CEQA/Nation Environmental Protection Act (NEPA) process showed that implementing WaterFix could have these exact impacts. The Project EIR must consider the Project's potential to result in similar impacts, using appropriate modeling assumptions and methodology, and disclose the results of the analysis.
638	Carol Moon Goldberg League of Women Voters of CA	We do not see that realistic limits have been placed on the amount of water to be exported, as the state has approved at least five acre-feet of consumptive water rights claims for every acre-foot of unimpaired flow in the Sacramento and San Joaquin river basins. Under these circumstances, protecting existing supplies consistent with existing water rights is not a sustainable strategy. This is especially true with the recent granting of permanent water rights under the WIIN Act (Water Infrastructure Improvements for the Nation), potentially extending demand claims.
639	Theodora K. Atkinson	Concerned about reduction of water for Northern CA

694	Delta Counties Coalition	The NOP also lists "Water Supply" as a probable effect category but for "changes in water deliveries." (NOP, p. 9.)The tunnel Project proposes changes to the hydrology of the Delta that will affect water availability and water quality throughout the Delta. Prior iterations of environmental review for Delta conveyance projects relegated impacts on local water supplies to other resource chapters of the EIR, making it necessary to review multiple chapters for impacts to local water supplies. On the other hand, impacts to export water supplies were conveniently organized in one chapter. The Draft EIR should analyze the changes in water supplies for all water users, both in and out of the Delta, using a readily understandable analytical approach.
698	Steve Lambert Butte County Board of Supervisors	The DCP should not expect additional water from the northern Sacramento Valley. It must consider that some of the water supplies currently being exported may not be available in the future due to increased demand in the areas in which the water currently being exported originates. California water law expressly recognizes the prior right of communities in those areas to water currently being exported, to the extent that water will be needed to adequately supply the beneficial needs of those areas (Water Code sections 10505, 10505.5, 11460, 11463, and 11128; also *id.,* sections 12200-12220). That demand for water and the need to sustain groundwater basins, as required through the implantation of SGMA, will increase in the Delta and areas north as population grows. The likelihood that less water will be available for export uses is reasonably foreseeable and must be evaluated in the EIR/EIS. The DCP must follow the principle of regional self-reliance.
707	Elaine Barut Little Manila Rising	Drinking Water 21. How will the tunnel impact the drinking water system? Will it cut off proper drinking water to certain communities or will there be a plan to work around it? 22. What will the filtration systems look like to make the water quality better (safe, drinkable) that is being delivered?
710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	In order to adequately analyze the Project's potentially significant impacts on our agencies' water supplies and the lower American River's steelhead and salmon, the EIR must specifically analyze the Project's impacts on Folsom Reservoir storage and the river's stream flows and water temperatures in back-to-back dry or critical water years. Because the reservoir is relatively small for its watershed, it tends to fill more frequently than other reservoirs, but it also lacks multi-year carryover storage capacity. The extensive technical analyses that our agencies and the Water Forum prepared for the SWRCB's California WaterFix hearing demonstrated that the greatest risk to our water supplies and the river's listed fish would occur in the second year of back-to-back dry or critical years if that project's operations were to result in reservoir releases that were too high in the first year of that cycle.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Water loss. This project is only one component of an overall system that needs repair. With this project, no new water will be created, only transferred. Once this water is transferred to the aqueduct, a large portion of it will be lost due to the leakage issue of the aqueduct. We request that the EIR include the cost for canal improvement and if not, how the project will mitigate for the waste of water that should have stayed in the Delta ecosystem.

718	David Strecker San Joaquin Farm Bureau Federation	Water loss. This project is only one component of an overall system that needs repair. With this project, no new water will be created, only transferred. Once this water is transferred to the aqueduct, a large portion of it will be lost due to the leakage issue of the aqueduct. We request that the EIR include the cost for canal improvement and if not, how the project will mitigate for the waste of water that should have stayed in the Delta ecosystem.
725	Susan Wilson	Water flows in the Delta are erratic and would not at all guarantee the touted water deliveries to the Central Valley and Southern California.
729	Erik Vink Delta Protection Commission	The EIR should assess the probable Impacts to south-of-Delta water users due to interruption or reduction of exports of Delta water conveyed through the proposed project due to drought, growing demand by north-of-Delta water users with superior water rights, alterations in runoff because of climate change, potential regulatory changes, or legal challenges. These and other threats make Delta water exports inherently unreliable. Contingency measures that could be employed in SWP and CVP service areas as well as in the Delta to mitigate this unreliability or restore water exports following these types of disruptions should be described.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (A) A reasonable range of flow criteria, rates of diversion, and other operational criteria required to satisfy the criteria for approval of a natural community conservation plan as provided in Section 2820 of the Fish and Game Code, *and other operational requirements and flows necessary for recovering the Delta ecosystem and restoring fisheries under a reasonable range of hydrologic conditions, which will identify the remaining water available for export and other beneficial uses*.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	DWR Must Analyze the Impacts of Providing Water to the Entire Project Pursuant to CEQA, an EIR "must assume that all phases of the project will eventually be built and will need water, and must analyze, to the extent reasonably possible, the impacts of providing water to the entire proposed project." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Ca$^{l.}$4th 412, 431.) Moreover, "[t]he future water supplies identified and analyzed must bear a likelihood of actually proving available; speculative sources and unrealistic allocations ("paper water") are insufficient bases for decision-making under CEQA." (*Vineyard Area Citizens,* 40 Ca$^{l.}$4th at 432.) Thus, the inventory and assessment in the water resilience portfolio required by the Governor's *Executive Order* are also the type of information required by CEQA to be in an EIR. The Draft EIR must provide this information regarding water needs and the impacts of taking the water. "Speculative sources and unrealistic allocations ("paper water") are insufficient bases for decision-making under CEQA.

748	Santa Clara Valley Water District (SCVWD)	Valley Water has water service contracts with both DWR and Reclamation for water supplies from the SWP and CVP. These imported water supplies support many beneficial uses in Santa Clara County, and are critical to prevent the return of historic groundwater overdraft and land subsidence in San Jose and adjacent cities. During dry and critically dry years, more than 90 percent of the County's surface water supply is imported. If no action is taken, Valley Water's SWP and CVP supplies will be vulnerable to risks from declining ecosystem condition, increasing regulatory restrictions, seismic risks, climate change, and sea level rise, resulting in reduced water supply reliability.
748	Santa Clara Valley Water District (SCVWD)	Valley Water also requests that DWR analyze the impacts of the proposed project on storage levels in San Luis Reservoir. The Proposed Project is likely to have impacts on San Luis Reservoir storage levels. When San Luis Reservoir is drawn down too low, the reliability and water quality of deliveries to the CVP San Felipe Division, which includes Valley Water, are adversely affected. When storage levels drop below an elevation of 369 feet, about 300,000 acre-feet in storage, known as "low point" conditions, algal blooms occurring during the summer can enter the lower intake of the Pacheco Pumping Plant and deliveries of Valley Water's CVP supplies can be adversely affected; water quality within the algal blooms is not suitable for municipal and industrial water users relying on existing water treatment facilities in Santa Clara County. Deliveries to the San Felipe Division may be severely or completely interrupted when storage levels are drawn down such that there is insufficient hydraulic head to effectively operate Pacheco Pumping Plant. While Valley Water is actively working with Reclamation and the State on a long-term solution to the low point problem, we request that the EIR provide a detailed description of the existing San Luis Reservoir low point issue, and operational protocols designed to minimize low point conditions. The EIR should also provide analysis and detail on the impacts of the action alternatives on storage levels, and on Valley Water's water supplies due to low point conditions.
751	Mary Ann Robinson	Climate change is already causing snow levels to decline; by the time tunnel(s) are completed, those water resources will be even more scarce.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effect", *"Water Supply: changes in water deliveries."* These assessments must include impacts to non-SWP and CVP water users including, but not limited to: changes in water surface elevation for diversion access, water diversion facility fouling from changes in aquatic weeds from alteration of water circulation patterns and duration of nutrient accumulation before flushing flows, changes in the rate and location of toxic algae and methylation of mercury, water supply suitability for designated beneficial uses, growth inducing impacts, etc.
767	Kelley Taber City of Stockton	The location and operation of the Project intakes presents the potential for significant adverse impacts to Stockton's water supply and operation of its RWCF treated wastewater discharge, through water quality degradation, as well as public health impacts.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy WR P1 (Cal. Code Regs., tit. 23, § 5003) requires proposed actions that export water from, transfer water through, or use water in the Delta to contribute to reduced reliance on the Delta and improve regional self-reliance. The Project proposes to increase water supply reliability, among other objectives, by constructing new facilities, including an isolated conveyance facility to be used in conjunction with existing through-Delta conveyance. The Council understands that as proposed, the Project would not alter existing water rights or contractual amounts. Because the Project proposes to export water from, transfer water through, or use water in the Delta, this policy is applicable. DWR should describe in detail how all water suppliers (defined as both wholesalers and retailers)2 that would receive water from the Delta as a result of the Project have adequately contributed to reduced reliance on the Delta and improved regional self-reliance consistent with the Delta Plan. DWR should provide information for each water supplier that includes: (1) identifying which water agencies have a current Urban or Agricultural Water Management Plan; (2) the identification, evaluation, and commencement of implementation activities identified in an Urban or Agricultural Water Management Plan that would reduce reliance on the Delta; and (3) the expected outcome for measurable reduction in Delta reliance and improvement in regional self-reliance. As for any large project that would trigger this policy, DWR should ensure that the record supporting the certification of consistency for the Project specifically addresses the following items: Listing of all urban and agricultural water users that would receive water as a result of the Project. Inclusion of quantifiable data documenting reduced reliance, as described by this policy, or a discussion of why this is not feasible. Analysis of reduced reliance under different export scenarios, considering the current range in Project capacity described in the NOP (3,000 to 7,500 cfs). In addition, the Council notes that at this time it is not clear how the CVP may or may not be involved in the Project. To the extent feasible, the EIR should clarify involvement of the Federal Government and clearly define which water suppliers would receive water as a result of the Project. This specificity would help the Council and other stakeholders understand the full range of potential impacts of the Project.

796	Byron Nelson, Jr. Hoopa Valley Tribe	Avoid assuming that changes in the timing of TRD water exports to the CVP can be made. Trinity River water is stored behind Trinity Dam, then flows approximately 10 miles to Lewiston Dam, where it is either released by the Bureau of Reclamation to the Trinity River or diverted to the Sacramento River. During warm weather, the temperature of water released to the Trinity can rise substantially as it flows between the two dams, especially when Trinity Dam releases are small and little flow is present in that reach. For this reason, the ROD provide": "the TRD [will] be operated to release additional water to the Trinity River, and the timing of exports to the Central Valley would be shifted to later in the summer to help meet Trinity River instream temperah1re requiremen"s." Compliance with Trinity River instream temperature requirements is required by water quality standards of the North Coast Regional Water Quality Control Board (NCRWQCB) , the water rights permits of the Bureau of Reclamation, and by the Biological Opinion adopted by the ROD. The Biological Opinion includes a mandatory condition, as follow": "7. In dry and critically dry water year types, Reclamation and USFWS shall work cooperatively with the upper Sacramento River Temperature Task Group to develop temperature control plans that provide for compliance with temperature objectives in both the Trinity-and Sacramento rivers." The NCRWQCB temperature objectives are: Lewiston Dam to Douglas City Bridge 60 degrees F July 1 – September 14 56 degrees F September 15 – October 1 Lewiston Dam to confluence of North Fork Trinity River 56 degrees F October 1 – December 31 Further, Water Rights Order 900 5, which governs the Bureau of Reclamation's TRD water rights certificates, provides: Permittee shall not operate its Trinity River Division for water temperature control on the Sacramento River in such a manner as to adversely affect salmon spawning and egg incubation in the Trinity River. Adverse effects shall be deemed to occur when average daily water temperature exceeds 56F at the Douglas City Bridge between September 15 and October 1, or at the confluence of the North Fork Trinity River between October 1 and December 31 due to factors which are (a) controllable by permittee and (b) are a result of modification of Trinity River operations for temperature control on the Sacramento River. If the temperatures in the Trinity River exceed 56F at the specified locations during the specified periods, Permittee shall immediately file with the Chief of the Division of Water Rights a report containing project operational data sufficient *to* demonstrate that the exceedance was not due to modifications of Trinity River operations for water temperature control on the Sacramento River. If, within fifteen days, the Chief of the Division of Water Rights does not advise Permittee that it is violating this condition of its water right, Permittee shall be deemed not to have caused the exceedance in order to control temperature on the Sacramento River. These temperature standards require rigorous adherence; they can made unattainable if the schedule for water exports to the CVP-SWP is modified. Accordingly, it is essential that the EIR not assume that changes in the schedule of Trinity River exports are possible even if that is desirable from the standpoint of the Delta conveyance.
826	Melinda Terry North Delta Water Agency	The Agency's specific interest is assuring that construction activities and conveyance operations proposed by the Proposed Project shall avoid interference with local water supply infrastructure and not impair the water availability for agricultural and municipal water users.

826	Melinda Terry North Delta Water Agency	In the Water Supply Chapter of the EIR, include a section describing impacts to the hundreds of municipal and agricultural underground wells and diversion intakes in the rivers and channels located in the Project Area: changes in water surface levels affecting performance of individual diversion intakes, particularly gravity-fed siphons and increased pumping costs;
826	Melinda Terry North Delta Water Agency	Consider providing an alternative water source to mitigate adverse impacts to existing water supply infrastructure and water quality in the north Delta.
830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	GROUNDWATER CONTRIBUTION TO SHASTA LAKE RESERVOIR AND DOWNSTREAM Please note that while our comments emphasize the Medicine Lake Highlands aquifer due to our intensive involvement in this watershed, these issues and concerns apply to all three Southern Cascade Volcanoes — Mount Shasta, Mount Lassen, and Medicine Lake Volcano. According to SGMA, a water budget requires "an accounting and assessment of the total annual volume of groundwater and surface water entering and leaving the basin, including historical, current and projected water budget conditions, and the change in the volume of water stored." The Delta Conveyance project should include a full water budget to understand inputs into the Shasta Reservoir, which would include the Medicine Lake Highlands. Volcanic aquifers in northeastern California supply spring-fed rivers that contribute significantly to California's water supply and are resilient to drought. Despite their importance, these volcanic aquifers have never been systematically studied, and are not officially recognized as aquifers. The springs in northern California are the primary source of the Pit, McCloud, and Upper Sacramento rivers. The most significant water storage in the Upper Sacramento River is in the groundwater systems, including Medicine Lake Highlands. The total volume of water stored in the underlying aquifer of the Medicine Lake Volcano is thought to be 20 to 40 million acre-feet, which is the same order of magnitude as California's top 200 reservoirs (42 million acre-feet). The Fall River Springs, which are fed by the Medicine Lake Highlands, are some of the largest first order springs in the United States. The Fall River Springs system is an extremely valuable water resource for California's agriculture and hydropower industries, as well as ecologically and for downstream communities. The water from the Fall River Springs, and nearby hydrologically similar springs provide as much as half the storage capacity of the Shasta Lake Reservoir. The MLH surface runoff contributes to the Upper Sacramento River, but that area is also a significant recharge area for the Fall River Springs, which have an estimated output of approximately 869,000 to 1.4 million acre-feet per year. The Medicine Lake Highlands' surface flow contributes to the Upper Sacramento River via the Fall River Springs, up to 1.1 million acre feet of water. As much as 85% of the summer base flows in the Pit River actually originates in the Fall River. The Fall River can supply as much as 22% of the storage capacity of Shasta Lake Reservoir. As noted in the Upper Sacramento IRWM Plan, "Water security in the USR is directly related to the vast underground storage capacity of Mount Shasta and the Medicine Lake Highlands and reinforced by a historically abundant snowpack." Moving downstream, Shasta Lake Reservoir provides about 41% of the water supplied by the U.S. Bureau of Reclamation's Central Valley Project (CVP).

880	Muriel Strand	Factors to be considered for a complete and robust analysis of this project include: 3. How will this project affect the Bay-Delta region and water resources?
891	Alice Neuhauser	For years the Bay-Delta ecosystem has been severely affected by a lack of freshwater flows that has led to loss of natural habitat for species and livelihood for Delta communities. Fresh water in the Sacramento and San Joaquin Rivers is in high demand. As a result, the federal Central Valley Project and California's State Water Project – massive water storage and delivery systems operated by federal and state agencies, respectively – function in a manner that increasingly reduces the amount of freshwater flows that make it through the estuary. In fact, from 1986 to 2005, water exports and upstream diversions reduced the average annual net outflow from the Delta into the Bay by nearly 50 percent, and in some months, nearly 65 percent. This extraordinary level of water diversion from the Delta has nearly driven extinct numerous fish and wildlife species. It has also severely decreased the amount of fresh water for people living in Delta communities to use for drinking, bathing, cooking, and recreating. In recent years, the lack of flow has led to large toxic algal blooms in parts of the Delta. So, this matters for the future of fish and wildlife. Let's get this right before it is too late.
1004	Blythe Reis and Mark DuPont	The EIR should analyze impacts to source waters and their reservoir storage including the Trinity, Klamath, Sacramento, Feather, Yuba and San Joaquin rivers.
1005	Stacy Sebring	How will this project impact tributaries?

Table D-17. Comments Regarding Surface Water Resources

Letter	Commenter Name, Affiliation	Comment Text
6	Brian Murphy	How many more acre feet of water are you planning to divert from our San Francisco bay/ Delta estuary down to our natural desert called Southern California?
11	David Gloski	Can you please make available an analysis of the Volume of Water Removed from river compared to Maximum and Minimum river flows during operation?
11	David Gloski	Please investigate and report the effect of having two intakes and how their proximity to each other and how they are operated will affect river flows? If they are both operating at a maximum take from the river and they are close this could increase their impacts.
14	Andrea Buckley Central Valley Flood Protection Board	I. Potential Impacts to the State Plan of Flood Control {SPFC) Operations and Maintenance The proposed project may involve modifications to one or more of the regulated streams under the Board's jurisdiction during the construction of the DCP. According to the NOP, page 4, Figure 1 Proposed Project Facility Corridor Options, the map shows that the proposed project is within the Old River, Middle River, Sutter Slough, Sacramento and San Joaquin Rivers. The proposed project facility corridor options shown in the NOP did not clearly identify the locations of the proposed construction activities within the SPFC and corresponding name of the affected regulated stream and or designated floodway that are within the Board's jurisdiction. The DEIR should identify the potential hydraulic effects resulting from the proposed construction activities that will be located within each of the regulated streams under Board jurisdiction pursuant to Title 23, § 112, Table 8.1.
14	Andrea Buckley Central Valley Flood Protection Board	The DEIR should include reasonable alternatives and mitigation measures that that will not interfere with the SPFC Operations and Maintenance.
14	Andrea Buckley Central Valley Flood Protection Board	II. Potential Impacts to Levee Roads Resulting from Increased Traffic during DCP Implementation The construction of conveyance facilities and the identified ancillary facilities may result in transportation impacts to levees and loss of levee integrity, leading to levee failures. The DCP alternatives that would increase traffic due to truck haul routes using levee crown roadways for extended periods may impact levees due to excessive load resulting in levee deformation and crest depression. Damage to levee slopes can also result from the use of levee hinge points for vehicle turn-outs. Recommendation: The mitigation measures for geologic effects resulting from haul routes or construction zones within or crossing over levee roads should include pre project inspections and levee geometry surveys for the elevations of levee crests on the waterside and landside. Any project work including subsequent levee reconstruction and emergency repairs must be compliant with Board requirements and standards pursuant to Title 23.

48	Libby Lucas	In regards elements that believe should be addressed in scoping of an EIR on feasibility of a single tunnel diversion option for Delta conveyance, please reference historical allocations and annual Sacramento River flow data cited in San Francisco COE1992 Sediment Budget Study for San Francisco Bay. This Ray Krone & Associates report has all data basic to analysis of diversion flows.
48	Libby Lucas	Another critical source document is USGS annual recorded Delta river flows which include sediment deposition at gaged locations, i.e.. on December 24, 1964, 525,000 tons of sediment were deposited at Freeport, portal location of proposed conveyance diversion. It is high storm flows that tunnel diversion hopes to capture, but tons of sediment load will critically challenge tunnel maintenance.
48	Libby	Request you also address these specific areas of concern: - will earthquake resilience be factored into this analysis of erosion of levees and incremental island subsidence
50	Michael Tognolini East Bay Municipal Utility District	Impacts on Sacramento River Flows at the Freeport Regional Water Project Intakes Modeling efforts undertaken in connection with the previous iteration of this Delta conveyance project demonstrated that Project operation may result in increased frequency of reverse flow conditions at Freeport sufficient to require a FRWP shutdown. The Project EIR must fully assess Project's flow impacts on the Sacramento River at and near Freeport, including the increased frequency of reverse flows that will trigger shut downs of the FR WP. Before this assessment is undertaken, we believe it will be necessary to define operational parameters of the project to a sufficient level of certainly to yield meaningful analytical results. If the assessment shows the Project may cause increased reverse flows at Freeport so as to affect FR WP operations, the Project proponents must provide mitigation for the associated significant water supply, financial, and operational impacts.
67	Aaron Lowe	Well, at least I can plan to retire to the Southwest since it will have an abundance of water coming online via this project.
87	Jaclyn Shaw	(2) EMPTY TUNNEL and Rural folks would have less to pay taxes? Would County rural folks and others pay increasingly more for empty, costly aqueducts or one “big tunnel, enough for a car to nowhere”?

107	Betsy Wilde	This new plan and its short public commentary period is impulsive and contradicts the promises that you made, as governor, to stand up to corporate greed and faulty federal science. Many people who care and would have a voice are unaware of the proposal and it is flying fast under the radar. The Delta Tunnel project states it would divert water from the Sacramento River. This is deceiving, as the Sacramento pulls water from Whiskeytown lake in times of low flow. Whiskeytown Lake is filled by the Trinity River, a tributary into the Klamath. In 2017 the Klamath and Trinity rivers witnessed the worst fall run Chinook salmon return in recorded history, leading to disastrous results for both the commercial and recreational fishing in California and Oregon. That year only 1,123 adult winter Chinook salmon returned to the Sacramento Valley. Though we have had near average precipitation in the last few years we cannot make a plan based on the assumption that this trend will hold out in the face of climate change. The fish cannot spare another drop and certainly not the 67,325 gallons a second your plan proposes. It is nearsighted to argue that we, the people, wish to let our water simply run into the ocean for a mere fish. We, the people of the Trinity Valley see the fish as an integral part of our life, it is the canary in a coal mine for the health of all species in this ecosystem. Those who do not know this place cannot imagine the wealth a healthy river with adequate flows contributes to the ability of the sovereign nations of the Hupa and the Yurok to thrive. The scope of your investigation into this plan's viability must include environmental impact studies on the Trinity River and the Klamath River. It is ill informed to say that it will not have an effect on our river system. Please invite scientific inquiry from outside the federal scope to determine the consequences for our life source.
121	Petition: Save Our Salmon	Make no mistake this Portfolio and new massive One Tunnel diversion are modern day water grabs and are in line with the Trump administration's attack on California's environment. Orwellian language cannot save the salmon or our drinking water supplies. The governor is selling out the north state, the fishing industry, tribes, cities, and the environment to benefit wasteful agricultural water users. Help us fight the water Portfolio, State Water Plan, Delta Tunnel Proposal and Sites Reservoir. Water Is Life!
128	Nancy Kuykendall	For the study, I want the build project alternative to account for the source of every drop of water that would be sent south in a delta tunnel. I don't want any water from the Klamath or Trinity rivers to be diverted as there is too much water taken from those systems now.
131	Felice Pace	Analysis of Delta Conveyance impacts should include: Assessing potential impacts to the Trinity River and Klamath-Trinity salmon stocks, including SONC Coho salmon and Trinity River Basin Spring Chinook salmon.

131	Felice Pace	Analysis of Delta Conveyance impacts should include: Assess the impact of the increased water exports from the Trinity and Klamath Rivers that would be needed to fill the conveyance in order to meet federal and state water project contracts on long-term efforts to restore Klamath- Trinity River Basin salmon stocks. How will those stocks and the restoration effort, especially streamflow needed for restoration to be impacted?
131	Felice Pace	Analysis of Delta Conveyance impacts should include: Assessing potential impacts to Trinity Reservoir, recreation related to that reservoir and related impacts to the economy of Trinity County.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	We request that the DEIR provide a map of the watersheds where the project is located, including watershed boundaries within Contra Costa County, and FC District drainage area boundaries.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	In the Hydrology Section, please identify and show all existing watercourses, tributaries, and man-made drainage facilities within and around the project site that could be impacted by this project within Contra Costa County. The discussion should include an analysis of the capacity of the existing watercourses. If improvements or work within the natural watercourses is proposed, the DEIR should discuss the scope of improvements.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The Hydrology Section should quantify the amount of runoff that would be generated by the project and discuss how the runoff entering and originating from the site would be distributed between the natural watercourses, the detention basins (if proposed), and the man-made drainage facilities. The DEIR should discuss the adverse impacts of the runoff from the project site to the existing drainage facilities, and drainage problems in the downstream areas.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	We recommend that the DEIR address the design and construction of storm drain facilities to adequately collect and convey stormwater entering or originating within the project area to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed, per Title 9 of the Contra Costa County Ordinance Code. The DEIR should discuss all proposed on-site and off-site drainage improvements and include maps or drawings for the improvements.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	Construction of new roads to serve the proposed project may result in altered drainage patterns and may increase stormwater runoff due to additional impervious surfaces. New culverts may be needed to convey the additional stormwater, which concentrates the flow, but may potentially cause erosion, if not mitigated. The DEIR should address the impacts of new conveyance facilities, including erosion, from newly concentrated flows resulting from the project and its ancillary facilities and propose mitigation measures including new culverts, channel widening, erosion protection, energy dissipaters, and vegetation restoration within Contra Costa County.

132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The proposed pumping plant, southern forebay, and central tunnel corridor shown on Figure 1 of the NOP appear to be located within Contra Costa County limits near unincorporated Byron and Discovery Bay. The central tunnel corridor extends northerly near the outer edge of Contra Costa County limits. The southern portion of the project is partially located in Drainage Area 45 (DA 45) and partially in Drainage Area 110 (DA 110). These drainage areas define the watersheds for the East County Delta Drainages and Brushy Creek watersheds. The DEIR should discuss how the project would impact these drainage areas.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The FC District owns several properties and operates major drainage facilities in east Contra Costa County including channels and reservoirs for Marsh Creek, Sand Creek, Dry Creek, Deer Creek, and Kellogg Creek. If the project and its proposed facilities impact the capacities and operation of FC District facilities, or if the project needs access to any FC District property, the DEIR should note that a Contra Costa County Drainage and/or FC District Encroachment Permit might be required. At a minimum, the DEIR should list the FC District as an agency to notify.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The D'ER's analysis of adverse impacts should include potential drainage impacts caused by all construction activities including tunneling, dredging, construction of new conveyance facilities and access roads, and storage of borrow material. Tunneling may create an abundance of excess material that may require off-site storage, and the DEIR should analyze the changes in drainage patterns and flows caused by both temporary and permanent storage of excavated materials.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	When the DEIR analyzes the impacts in Contra Costa County, the Hydrology Section of the DEIR should include a study that uses Contra Costa County's hydrology method (HYDRO6) for unincorporated areas impacted by the project. Other commonly accepted hydrology methods were developed using runoff patterns of other regions that do not accurately model the Pacific Coast storm patterns experienced in Contra Costa County. The runoff results of other methods have proven to be significantly less than field observations of local storms made by the FC District and the United States Army Corps of Engineers (USACE).
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The DEIR should address the impacts of this project's runoff due to the increase in duration (length of time) of flows and the effect on creeks and channels downstream of the project. Whereas detention basins are capable of mitigating peak flows to pre-project levels, they increase the duration (length of time) of flows in the downstream watercourses, which saturate the channel banks and increase the potential for stream and channel erosion.

132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	DA 45 and DA 110 have inadequate maintenance funding. The construction of this project should not result in added costs or reduction of revenue for Contra Costa County or the FC District. As one of the mitigation measures for the adverse drainage impacts of this project, this project shall be required to identify a perpetual funding source for maintenance of the drainage area facilities required to serve the project and its ancillary facilities, such as access roads and fuel stations.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	Portions of the project are situated in a Special Flood Hazard Area (SFHA) designated by the Federal Emergency Management Agency (FEMA) as Zone A or Zone AE. In addition, the project area incorporates areas designated by FEMA “s "Areas with Reduced Flood Risk due to Levee." The DEIR should also analyze potential adverse impacts on nearby levees due to construction activities.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The DEIR should discuss the impacts of grading in a floodplain and whether a Conditional Letter of Map Revision will be required.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The proposed intake locations between Courtland, Hood, and Clarksburg would reroute a portion of flows from the Sacramento River south to the Clifton Court Forebay, which may result in decreased flows through the Delta. The reduction in flows could result in increased sedimentation throughout the Delta tributaries in the eastern regions of Contra Costa County, which in turn could increase water surface elevations and create additional flood hazards. East Contra Costa County already has multiple areas designated as SFHAs, so the DEIR should include a thorough analysis on increased risks of flooding in all impacted tributaries along the eastern Contra Costa County limits.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The DEIR should consider the effects of anticipated rising sea levels on the Delta tributaries and cumulative effects with the Delta Conveyance Project due to the diversion of water out of the delta. Sea level rise in the delta could lead to increased frequency, duration, and extent of flooding, shoreline erosion, and increased salinity intrusion further into the delta. Adapting to Rising Tides, a program of the San Francisco Bay Conservation and Development Commission, is currently modeling effects of rising water surface elevations between 12 inches and 83 inches in eastern Contra Costa County during this century. The DEIR should address the impacts of the project with cumulative impacts from rising tides in the Delta and eastern Contra Costa County and propose mitigation measures.

132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The FC District should be included in the review of all drainage facilities that have a regionwide benefit, that impact region-wide facilities, or that impact FC District-owned facilities. The FC District is available to provide technical assistance during the development of the DEIR, including hydrology and hydraulic information and our HYDR06 method, under our Fee-for-Service program. In addition, we can provide copies of our drainage area maps, upon request.
135	Bayla Greenspoon	What will be the social, psychological and emotional consequences for the people who live along the rivers (including the Klamath, Trinity, Pitt, Sacramento) in Northern California? DWR says the EIR will address public health. Be sure to add these items into the public health category. By allowing over 6,000 CFS to be sent south through the tunnel, the rivers will be affected as will the fish and general environment around the rivers. The emotional, spiritual and psychological health of the people depends on the health and well-being of the rivers and the fish. Many of the youth spoke about depression and anxiety, and how they go to the river for emotional healing. I would like the EIR to answer: a. Exactly how many youth are expendable? b. What will be the cost of increased need for mental health services for the Tribes? c. What mitigations can be put in place to support social, emotional and psychological well-being of local populations including Tribes?
136	Mike Ackley	Can the pumps help us when we are flooding?
136	Mike Ackley	Will there be any water capture to save rain water snow melt?
136	Mike Ackley	Weather patterns have changed will there be water in the future for you to take?
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Reasons this project should not be built: 1. The impacts of recurring and potentially severe droughts would make any alternate conveyance either inoperable or more damaging. The climate is changing and it is predicted that snowfall in the Sierras will decrease. Since California depends on continued sufficient flows from the rivers, decreased snowfall may reduce the average flows, making this conveyance basically useless. Potential sea level rise could create higher water levels in the rivers, but would also increase salinity much further upriver, which could worsen with the new conveyance.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. Questions must be addressed that have to do with the size of the tunnel itself as well as the flows through the tunnel. You have stated that water will be taken only during “higher flows” and that no additional water will be sent south. What exactly does that mean? What are “higher flows”? How will this be determined? How will this determination be affected when average flows are reduced by climate change?

138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. The EIR must contain a detailed assessment the impact of taking water from the north Delta would have on existing water wells, the underlying aquifer and how it will be affected not only along the tunnel routes but spreading outward since the aquifer covers a wide area.

144	Martin Harris, Terra Land Group, LLC	TLG is writing this letter to make the Delta Conveyance Project (single tunnel) team members aware of what appears to be a joint effort by both local, state, and federal authorities to pursue a phased strategy of flood protection and other federally-assisted improvements both inside and outside of the South Delta to meet California Senate Bill No. 5 ("SB 5") requirements as well as provide improved efficiencies in the ways we currently are storing, delivering, reusing, and draining water. (See Enclosures 1-12) 2018-02-26 letter from TLG to the San Joaquin Area Flood Control Agency (https://www.dropbox.com/s/8scnhemfwexbkr9/2018-02-26_LTR_SJAFCA_LSJR%20EIR_Public Comm_wEncl.pdf?dl=0) 2. 2018-03-05 letter from TLG to the San Joaquin Area Flood Control Agency (https://www.dropbox.com/s/tl0ir7soookd6ze/2018-03-05_LTR_SJAFCA_Letter2.pdf?dl=0) 3. 2019-03-18 letter from TLG to the City of Lathrop Public Works Department (https://www.dropbox.com/s/musf61jmz7azjvy/2019-03-18_LTR_LPW_EIRWaterResPlan.pdf?dl =0) 4. 2019-01-15 letter from TLG to the California Department of Water Resources (https://www.dropbox.com/s/0rgif3aql6dwg35/2019-01-15_LTR_DWR_CAWaterPlan.pdf?dl=0) 5. 2019-11-20 letter from TLG to the Delta Conveyance Design and Construction Authority (https://www.dropbox.com/s/tlnfyrri524q6gq/2019-11-20_LTR_DCDCA_AgIt7b.pdf?dl=0) 6. 2019-12-09 letter from TLG to the Lathrop City Council (https://www.dropbox.com/s/qkk2an4jzivbh29/2019-12-09_LTR_LCC_AgIts5.1.pdf?dl=0) 7. 2019-12-09 letter from TLG to the San Joaquin County Board of Supervisors (https://www.dropbox.com/s/6p3tm8gcjg57lxi/2019-12-09_LTR_SJCBOS_AgIt1.pdf?dl=0) 8. 2020-01-29 letter from TLG to J.D. Hightower (https://www.dropbox.com/s/ljlrkxqsol7p5dc/2020-01-29_LTR_Hightower_GeneralPlan.pdf?dl=0) 9. 2020-01-29 letter from TLG to the State of California Water Resilience Portfolio Initiative (https://www.dropbox.com/s/gt61vuwc7ju21mh/2020-01-29_LTR_WRP_PubComm.pdf?dl=0) 10. 2020-02-12 letter from TLG to the Central Valley Flood Protection Board (https://www.dropbox.com/s/njodon28y8j2yx8/2020-02-12_LTR_CVFPB_AgIts4A.pdf?dl=0) 11. 2020-03-02 letter from TLG to the Manteca City Council (https://www.dropbox.com/s/u3aw0nashy9137t/2020-03-02_LTR_MCC_AgItsC1.pdf?dl=0) 12. 2020-03-09 letter from TLG to the Lathrop City Council (https://www.dropbox.com/s/63eimrc8ygwp73j/2020-03-09_LTR_LCC_AgIts2.2.pdf?dl=0)

144	Martin Harris, Terra Land Group, LLC	1. TLG believes that storing, delivering, reusing, and draining water in and along the South Delta becomes complicated when it is considered that the January 2018 San Joaquin River Basin Lower San Joaquin River, CA Final Integrated Interim Feasibility Report/EIR/EIS: (LSJRFS) includes the following: Page ES-1 of the LSJRFS states: The study area also includes the distributary channels of the San Joaquin River in the southernmost reaches of the Delta; Paradise Cut and Old River as far north as Tracy Boulevard, and Middle River as far north as Victoria Canal. Page 3-31 of the LSJRFS states: Currently, the levee safety program has defined the levee system that incorporates RD 17 as bounded on the north by Walker Slough, west by the San Joaquin River and south by the Stanislaus River. This includes RD 17, RD 2096, RD 2094, RD 2075 and RD 2064. Page 5-17 of the LSJRFS states: Stanislaus River to Paradise Cut. The confluence of the San Joaquin and Stanislaus Rivers defines the upstream extent of the hydraulic model used for this study. Page ES-2 of the LSJRFS states: Analysis of the study area is challenged by the presence of three sources of flooding, the Delta Front, Calaveras River and San Joaquin River. This results in commingled floodplains for the North and Central Stockton areas. The distributary nature of the Delta also affects Delta water levels, because high flows from the Sacramento River may “fill” the Delta prior to a peak inflow on the San Joaquin River as occurred in 1997, raising water levels on the Delta front levees. Page 5-27 of the LSJRFS states: 2.1.1 FLOODING Problem: There is significant risk to public health, safety and property in the study area associated with flooding. The study area is located in the Central Valley of California which has very little topographic relief, resulting in potential flooding of areas far from water courses… (See Enclosure 1)

144	Martin Harris, Terra Land Group, LLC	TLG believes that all Mossdale Tract Flood modeling and Adequate Progress reports that have been publicly released to date have failed to fully consider and provide mitigation measures for: (i) Unresolved and continuing sedimentation issues that continue to reduce channel flow capacity in and along the South Delta Lower San Joaquin River System; and (ii) Climate change and continued uncertainty relating to its effect on increasing the total potential volumes of channel flows to be expected in and along the South Delta Lower San Joaquin River System; COMMENT : Martin Harris and several other South Manteca rural neighbors attended a Central Valley Flood Protection Board Workshop on February 14, 2020. Although a number of climate change presentations were made by staff, flood models and associated drainage flow volumes related to climate change do not appear to have been fully determined. QUESTION : What effect will this have on determining the total amount of reservoir storage water that can be safely stored in higher elevations throughout the Sacramento and San Joaquin River Reservoir System(s)? (iii) A Stanislaus River right bank levee breach in the areas west of the City of Ripon; and (iv) Limited topographic relief to ground surface areas in and along the South Delta; QUESTION : Will mitigation measures be included to prevent any potential for reverse channel flows and associated backwater effects that may impede the natural flow of Old River as identified on pages 3A-28 and 3A-29 of the Bay Delta Conservation Plan California WaterFix Final EIR/EIS (December 2016)?
145	Meredith Cooper	I am writing to let you know that I have grave concerns over this proposed project and feel that it would deleteriously harm the watersheds which depend upon flows from the Trinity River.
145	Meredith Cooper	The EIR should analyze the impacts to source waters, and their reservoir storage, including the Trinity, Klamath, Sacramento, Feather, Yuba and San Joaquin Rivers. Water quality impacts from any increased diversions should be included in this analysis.
145	Meredith Cooper	The EIR should analyze the cumulative impacts of the Delta tunnels with the new Trump administration Biological Opinions for the Trump Water Plan, the long term operations of the State Water Project, the Shasta dam raise and the proposed Sites Reservoir. Would these new projects and rules be used to fill the tunnels?
151	Felice Pace	The EIR MUST fully analyze and disclose the extent to which water from the Klamath-Trinity River Basin would be needed to meet the "conveyances" water transport capacity.
161	Dr. Steven White	With respect to the bulleted “groundwater” and “water supply” topics, how will the withdrawal of so much freshwater along the Sacramento River affect the water table level in the immediate and surrounding Delta area? How will it affect aquifer salinity and recharge rates in that area?

167	Tracey Licerio	Please consider these following items during the scoping period and the EIR process being conducted for the Delta Conveyance Project: • What is the indirect affect on the Trinity River? • Adverse affects on the Sacramento River watershed
177	Sunny Cosce	I am writing this email to urge you not to divert any more water from the Trinity River for any reason. The Trinity is the largest tributary to the Klamath River, which is where my family lives.
183	Menmery Bates KTUSD	Comment opposes the project and is concerned about the impacts to tribal communities and reduced surface water supplies for wildlife and domestic use.
189	Maximilienne Ewalt	Delta levees should be reinforced with trees, not metal or rocks to reduce and prevent erosion.
248	Tom Williams	Provide definitions and quantification of lowest intensity likely (1/500) to produce a breaching of a levee under “normal” flows and in the event of “Plus 5-foot flows” (flood or sea rise).
248	Tom Williams	Provide quantitative records (maximum, flows, duration, elevations, etc.) for 2010-date bypassing all “Flood Flows”. Provide and quantify the most probable recipient of averaged, base, and one-month periodic flows and whether for direct use or indirect reuse after underground or surface storage. Provide list of specific quantified conditions for the EIR and for the EIS Project conditions and operations and require Amended DEIR/DEIS recirculation and review/comment with any physical or operation (flows) involvement of the federal CVP or other such projects.
340	Dan Nomellini, Jr. Central Delta Water Agency	And for the scoping comments, I would request that you explain how not one drop of water will be exported with a tunnel that is needed to maintain adequate Delta water quality.
419	Michael DiMartino	Crystal Geyser, battling a half a billion bottles of water up on Mount Shasta. That affects the Delta. It's not just their problem over there. This is a watershed. Shasta Dam, the remediation of Paradise, and all the toxins that are being dumped into your water here.
460	Isaac Kinney	There's not enough safeguards to prevent the adverse effects of t– --to the Trinity River. Please include the cumulative effects. This project perpetuates the economic apartheid affecting indigenous communities on a local, regional and global level.
517	Dan Liveley	The hydrology of the Delta will be further compromised by the 60-foot tunnel.

561	Diane Riddle State Water Resources Control Board	The EIR should include detailed modeling results as well as appropriate summary results that allow for meaningful evaluation of potential environmental effects of the Project at appropriate model time steps. Summary modeling data should have sufficient granularity to determine whether there may be significant impacts in different hydrologic conditions or times of year, including impacts to water quality, fish and wildlife, recreation, and agricultural and municipal uses of water. Specific parameters that should include summary and detailed modeling results include river flows, Delta outflows, reverse flows, stage, velocity, north and south Delta exports, reservoir storage levels, temperatures, and salinity. The presentation of modeling results should be uniform, clear, and consistent. Additionally, full model studies and results should be shared with the public promptly following the release of the EIR.
563	Federico Barajas San Luis & Delta Mendota Water Authority	The Water Authority requests that DWR analyze the impacts of the proposed project on (1) the operations of Jones Pumping Plant and (2) the storage levels in San Luis Reservoir. Water Authority member agencies are reliant on the operations of Jones Pumping Plant to provide water supplies for communities, ecosystems, and the economic activity within their respective service areas. The Proposed Project could impact coordinated operations of the Central Valley Project and State Water Project, including the operations of Jones Pumping Plant, and have environmental effects on the CVP service area. The environmental effects of the Proposed Project on the CVP service area, including the service area of Water Authority member agencies, must be analyzed and mitigated. Reclamation is currently considering a project to address the San Luis Reservoir low point issue that negatively impacts Authority member agencies CVP supplies in dry years and the Proposed Project is likely to have impacts on San Luis Reservoir storage levels. When San Luis Reservoir is drawn down too low, the reliability and water quality of deliveries to the CVP San Felipe Division are adversely affected. Deliveries to the San Felipe Division may be severely or completely interrupted when storage levels are drawn down below 300,000 a.f. While Reclamation and the State are actively working on a long-term solution to the low point problem, we request that the EIR provide a detailed description of the existing San Luis Reservoir low point issue, and operational protocols designed to minimize low point conditions. The EIR should also provide analysis and detail on the impacts of the action alternatives on storage levels, and on Authority member agency water supplies due to low point and other foreseeable conditions in San Luis Reservoir, including implications of the operations of the Proposed Project on the federal-state share of storage in San Luis Reservoir taking into account the Coordinated Operation Agreement.

570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	The DEIR should consider effects during Droughts: As discussed in our January 6, 2020 comments, DWR has admitted that waivers of protective operations are "reasonably foreseeable" during future droughts, similar to the waivers of water quality standards and ESA/CESA protections during 2013- 2015. The DEIR must account for the impacts of waiving or weakening these protections during future droughts, because the analysis of environmental impacts must rely on measures that are reasonably certain to occur.
576	Kelley Taber Sacramento County Water Agency	The EIR must adequately identify, analyze, and avoid or mitigate the Project's potential impact on the FRWP intake facility and SCWA water supply due to the increased likelihood of significant reverse flow events. In evaluating impacts to the FRWP, the EIR must employ the appropriate methodology. The Project is likely to shift the timing of Sacramento River flows, and under certain circumstances, increase the frequency of reverse flow events that would result in a controlled shutdown of the FRWP on the Sacramento River. Shutdowns of the FRWP intakes critically impact SCWA's ability to serve water to its customers during drought periods. The Project's potential to affect the occurrence of reverse flows at the FRWP stems from its potential to change the manner in which the CVP and SWP are operated. The Project's north Delta intakes may be operated in a way that shifts the timing and magnitude of the CVP's and SWP's north-to-south water exports. DWR or the U.S. Bureau of Reclamation (Reclamation) may choose to release water from upstream reservoirs that otherwise would have remained in storage until a later time and to redivert the released water through the north-Delta intakes for export. If the new north-Delta intakes are operated in this manner, the resulting shift in reservoir releases and export patterns may result in periodic reductions in the volume and velocity of water flowing down the Sacramento River past the FRWP intake, compared with the status quo. The reduced downstream flows would strengthen the tidal influence at Freeport Bend. Stronger tidal influence will lead to more or stronger reverse flow events at Freeport Bend. Some of those reverse flow events would be strong enough to require shutdown of the FRWP intake facilities, affecting SCWA's ability to provide water to its customers. In developing the modeling and EIR analysis of these issues, DWR should carefully consider the expert evidence submitted in the WaterFix water rights change petition hearing by SCWA, EBMUD, and other stakeholders. Specifically, SCWA refers DWR to the work by MBK Engineers and Daniel B. Steiner relating to the CALSIM II model assumptions, which will inform DWR of the type of information, assumptions and methodology necessary to properly evaluate these impacts.

598	Bill Emlen Solano County	The proposed changes in Delta operations may impact water quality and quantity on County water supplies for urban, agricultural production, and natural habitats. Major cities in the County along with Napa County (together totaling over 400,000 residents) receive water from the SWP though the North Bay Aqueduct (NBA) intake located in Solano County. Other land owners and reclamation districts in and around Solano County also obtain water from the Delta area for their water supply and to support agricultural production and habitat. The Project construction and operations could create water quality impacts on the County's water supplies, particularly with potentially increased salinity associated with alterations of fresh water flowing into the Delta as well as reduced water quality associated with restoration projects intended to increase diversions. Changes in water quality and quantity that could impact water intakes in the County would result in reduced use of the NBA and other surface and agricultural supplies if the Delta water supply is not treatable or viable for use. Furthermore, SWRCB Water Rights Decision 1641 requires DWR meet water quality objectives at municipal and industrial diversion points, including the NBA and those for agricultural beneficial uses. As such, the EIR must fully analyze and evaluate the environmental effects on Delta-dependent water supplies. Such an analysis must also include the potential water quality impacts associated with increasing sea levels from climatic changes. Appropriate financial assurances must be identified to address and mitigate any potential adverse impacts and corrective actions needed (such as the costs to construct and operate desalination, brackish water treatment or other plants) that may occur as part of Project operations.
610	Henry Kuechler Reclamation District No. 2060	The project will be subject to flooding if improvements in surrounding levees are not made. Upgrades to levees adjacent to project facilities and those required to support construction traffic must be considered. Impacts from years of construction traffic can degrade the existing levees, thus improvements/repairs must be made prior to and after construction of the project.
612	Warren Bogle Reclamation District 150	The project will be subject to flooding if improvements in surrounding levees are not made. Upgrades to levees adjacent to project facilities and those required to support construction traffic must be considered. Impacts from years of construction traffic can degrade the existing levees, thus improvements/repairs must be made prior to and after construction of the project.
619	Bob Panzer	With what water will future Delta tunnel and dams and reservoirs be able to operate?
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Buena Vista Rancheria of Me-Wuk Indians would like to see a minimum analysis utilizing hydrodynamic models performed on the aforementioned water quality chemical constituents for a pumping regime of 0 cfs, 3,000 cfs, 6,000 cfs, 7,000 cfs using winter flow rates in the Sacramento River that reflect historical low rates in wet, average and drought years.

626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Study flow rates that are projected based on climate change modeling based on different scenarios including a reduction in carbon emissions and a no change in carbon emissions, that influence sea level rise and precipitation patterns.
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	With what water will future Delta tunnel and dams and reservoirs be able to operate?
637	Osha Meserve Local Agencies of the North Delta	The project would modify the State Plan of Flood Control by making modifications to levees in two locations along the eastern bank of the Sacramento River. Proposed designs must be developed in coordination with the Central Valley Flood Control Board, as well as local flood control agencies in order to avoid deleterious changes to the flood control system. The Draft EIR should also consider the potential for project facilities to be flooded, given proposed placement within a historic floodplain. In addition, project facilities are proposed to be placed within areas protected by levees maintained by local reclamation districts. The project should be designed to avoid interference with levee maintenance and flood fighting activities. As alluded to in Secretary Crowfoot's remarks in a Press Release, the project should also be accompanied by improvements to the flood control system. Statewide and locally important infrastructure in the Delta must continue to be protected by the Delta's levee system even if the project is constructed.
662	John McManus Golden Gate Salmon Association	The DEIR should consider effects during Droughts: As discussed in our January 6, 2020 comments, DWR has admitted that waivers of protective operations are "reasonably foreseeable" during future droughts, similar to the waivers of water quality standards and ESA/CESA protections during 2013- 2015. The DEIR must account for the impacts of waiving or weakening these protections during future droughts, because the analysis of environmental impacts must rely on measures that are reasonably certain to occur.
677	Jeff McCormack JT McCormack, Inc.	Although the long-term forecast is for more variability in the flood-drought cycle, and more extreme droughts and extreme floods, this week's reports claim that we have been entering a "mega-drought" not seen in 400 years. Therefore, your EIR should include impact projections of what will happen to the Sacramento River Delta under the conditions forced by that scenario.
677	Jeff McCormack JT McCormack, Inc.	Because we know that the conditions are cyclic, and the alternating extremes are expected to be closer together, flood years will be more extreme as well, and their intensity and timing should be investigated, and levee investments promoted as mitigation for the impacts created by water diversions out of the Sacramento River.
683	Jeff McCormack Reclamation District 1002	Another environmental impact will be that ring levees will displace waters that would otherwise have been dispersed over more area, drying out more quickly than would now occur. Therefore this project will cause floodwaters to remain longer. That will have an economic impact in the reclamation district, by interfering with pruning and spraying.

683	Jeff McCormack Reclamation District 1002	The 400 acres of staging area for your Main Launch Shaft, and related area across I-5 north of Twin Cities Rd. might have perimeter boundaries of 3-4 linear miles. Ring levees to protect all that will likely be more than just the calculation of a compact footprint, as roads will need to be protected as well, or risk access problems for weeks at a time. A second site across I-5 would increase both the surface area and the perimeter around the new site.
683	Jeff McCormack Reclamation District 1002	Adjacent landowners affected by flooding will probably include those in Point Pleasant, near Franklin Field and Cosumnes Prison. Past floods have required evacuations from there.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	The Project would also increase diversions of water that currently flows through the Sacramento River into the Delta, further reducing available flows into and through the Delta ecosystem. With less water in the rivers and more water in the pipes of water exporters, the fish and the Delta ecosystem would suffer, while the wasteful and polluting practices of many of those who use the exported Delta water will be allowed to continue, if not expand. The DEIR should expose these undesirable and unlawful consequences of the Project.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	Where possible, the lead agency must employ feasible mitigation measures that could avoid or minimize the project's significant adverse impacts. PRC§ 21002; CEQA Guidelines§§ 15121, 15126.4. Accordingly, DWR must consider and address how the Project will impact flows in the Trinity River System, and to what extent the Project will exacerbate existing violations of the NMFS Trinity BO. And, DWR must also mitigate this potentially significant impact, if feasible. PRC§ 21002; CEQA Guidelines§§ 15121, 15126.4. In order to mitigate this potentially significant impact, DWR must commit to enforceable conditions preventing the delivery of additional Trinity River water through any new Delta conveyance.
710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	In order to adequately inform the public and decision makers, the EIR must analyze the Project's potential effects on Folsom Reservoir and the lower American River. It is particularly important that DWR analyze the Project's potential effect on storage in Folsom Reservoir during dry cycles of two or more consecutive years. The 2012-2016 drought demonstrated that conditions and regulatory requirements that apply across the coordinated operations of the SWP and the CVP tend to particularly affect Folsom Reservoir storage. Impacts to Folsom Reservoir occurred through the combination of, among other factors, the efforts to hold water in Lake Shasta to maintain Sacramento River water temperatures and the obligation-sharing formulas in the Coordinated Operations Agreement (COA). As a result, through 2014 and 2015, Folsom Reservoir's level was at near continual risk of being lowered below a level at which its municipal water-supply intake would function properly.

715	Daniel Wilson Reclamation District 3	The project will be subject to flooding if improvements in surrounding levees are not made. Upgrades to levees adjacent to project facilities and those required to support construction traffic must be considered. Impacts from years of construction traffic can degrade the existing levees, thus improvements/repairs must be made prior to and after construction of the project.
726	Roger Cornwell Sacramento River Settlement Contractors	In addition, the Delta Reform Act of 2009 states that water rights shall not be impaired or diminished as a result of its provisions, including projects such as the Delta Conveyance Project. In order to adequately inform the public and decision-makers about the environmental impacts of the proposed project, the draft EIR must provide sufficient information about operations to demonstrate that the proposed project will not impact said senior water rights or contract rights, and will not reduce available water supplies, both surface and groundwater, for the economy and environment in the Sacramento River Basin.
729	Erik Vink Delta Protection Commission	Protect in-Delta water resources. The project's effects on in-Delta water uses should be carefully assessed. This should include modeling that forecasts the effects of the project's operations, together with ongoing State Water Project (SWP)and Central Valley Project (CVP)operations using existing south Delta facilities, on water quality parameters that affect in-Delta uses. Key parameters that should be assessed include salinity, organic carbon, temperature, in-Delta and through-Delta flows, and outflows to the Bay. The EIR should describe the implications of changes in these parameters on agriculture, municipal water suppliers that rely on Delta water, Delta industrial uses, such as food processors and petrochemical plants, Delta sport fisheries, and recreation, including the spread of aquatic invasive species and harmful algal blooms. The Department of Parks and Recreation's Division of Boating and Waterways(DBW)and other agencies such as the CA Department of Fish and Wildlife (DFW) and State Water Resources Control Board (SWRCB) should be consulted for current data. This modeling should report outcomes for key parameters over time, through at least 2050, so that readers can understand the project's longer-term effects as climate change affects sea levels and makes runoff to the Delta less predictable. Implications of the project for wastewater agencies discharging to the Delta should also be explored.

729	Erik Vink Delta Protection Commission	Assess flood risks and plan for post-flood recovery. Areas where key project facilities would be located are protected by levees where the risk of levee failure contributes to their ranking in the Delta Plan as very high priorities for State-funded levee improvements. In the north Delta these facilities, including the proposed diversion facilities, an electrical building, sedimentation basin and appurtenant structures, are protected by the levees of Maintenance Area No. 9 South. Similarly, the Byron Reclamation District's levees protect access to and operational facilities at Clifton Court Forebay, including presumably the new pumping facility. The EIR should describe how these project facilities would be protected from flooding in the event of levee failure, how SWP workers would access these facilities until floodwaters drain, how SWP operations would be maintained or restored after that flooding, and measures to reduce the risk of levee failure affecting project facilities.
729	Erik Vink Delta Protection Commission	Protect levees and drainage facilities. The current Delta is a creation of its network of levees and drainage works. Any threat to them risks lives, property, agriculture, legacy communities, recreational destinations, important wildlife habitats, and the region's unique culture. The facilities already face threats to their stability and durability. This project should not add to those perils, but rather should reduce them where feasible. Such an outcome would further the project's objective of anticipating rising sea levels and reducing the risk of levee breaches that may degrade the water quality and threaten water supplies.
729	Erik Vink Delta Protection Commission	Assess and mitigate impacts to levees and drainage facilities using up-to-date information. Impacts to levees and drains cannot be assessed without up-to-date information about their locations and condition. This information should be gathered along the alternative project corridors now, including affected reclamation districts five-year plans, background information from the Delta Plan's levee investment strategy, and conversations with levee engineers from affected districts. Pursuant to Water Code section 85089, DWR or the DCA should reimburse reclamation districts for any costs they incur assisting DWR in gathering this information. The Central Valley Flood Protection Board's (CVFPB) permit fee schedule may offer insights into appropriate rates of reimbursement for this consultation. The EIR should assess impacts to levees for the full range of activities from project construction and operation. Construction activities that should be considered include levee encroachments, dewatering, grading, tunneling, tunnel material handling and storage, construction-related traffic on levee-top roads, project-related habitat restoration, and other activities. Operational impacts to consider include filling and draining project forebays, changes in Delta flows, especially those that could affect siphons, seepage, or drainage at affected reclamation districts, construction-related structures such as pilings and in-channel coffer dams, and the effect of project fills and embankments on flood flows in the event of a breach of nearby levees.

729	Erik Vink Delta Protection Commission	Mitigate adverse effects to levees and drainage networks. Recommendations from Delta reclamation district engineers should be a primary source of mitigation measures to reduce or compensate for project-related risks to Delta levees or drains. At a minimum, these measures should conform with Delta Plan MMRP 5-1through 5-5, 11-3, 11-7, and 11-9. Other potential mitigation measures may be outlined in the CVFPB's encroachment regulations concerning levees, retaining walls, miscellaneous encroachments, and pipelines, conduits, and utility lines, as they may apply.
730	Reclamation District 551	The project will be subject to flooding if improvements in surrounding levees are not made. Upgrades to levees adjacent to project facilities and those required to support construction traffic must be considered. Impacts from years of construction traffic can degrade the existing levees, thus improvements/repairs must be made prior to and after construction of the project.
730	Reclamation District 551	Stockpiling rock at strategic locations throughout the Delta will better enable local maintaining agencies to respond to emergency levee breaks. The EIR for the proposed Project must clearly describe the potential for stored water to breach the surrounding levees, with water flowing out of the forebay and onto adjacent land within Pearson District and damaging surrounding property. The EIR must also describe the effectiveness of any contingency plan for remediating the damage if there is a levee break, and propose suitable mitigation to offset any identified impacts.
740	Ryan Hernandez Contra Costa County Water Agency	We request that the DEIR provide a map of the watersheds where the project is located, including watershed boundaries within Contra Costa County, and FC District drainage area boundaries.
740	Ryan Hernandez Contra Costa County Water Agency	The Hydrology Section should identify and show all existing watercourses, tributaries, and man-made drainage facilities within and around the project site that could be impacted by this project within Contra Costa County. The discussion should include an analysis of the capacity of the existing watercourses. If improvements or work within the natural watercourses is proposed, the DEIR should discuss the scope of improvements.
740	Ryan Hernandez Contra Costa County Water Agency	The Hydrology Section should quantify the amount of runoff that would be generated by the project and discuss how the runoff entering and originating from the site would be distributed between the natural watercourses, the detention basins (if proposed), and the man-made drainage facilities. The DEIR should discuss the adverse impacts of the runoff from the project site to the existing drainage facilities and drainage problems in the downstream areas.

740	Ryan Hernandez Contra Costa County Water Agency	We recommend that the DEIR address the design and construction of storm drain facilities to adequately collect and convey stormwater entering or originating within the project area to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed, per Title 9 of the Contra Costa County Ordinance Code. The DEIR should discuss all proposed on-site and off-site drainage improvements and include maps or drawings for the improvements.
740	Ryan Hernandez Contra Costa County Water Agency	Construction of new roads to serve the proposed project may result in altered drainage patterns and may increase stormwater runoff due to additional impervious surfaces. New culverts may be needed to convey the additional stormwater, which concentrates the flow, but may potentially cause erosion, if not mitigated. The DEIR should address the impacts of new conveyance facilities, including erosion, from newly concentrated flows resulting from the project and its ancillary facilities and propose mitigation measures including new culverts, channel widening, erosion protection, energy dissipaters, and vegetation restoration within Contra Costa County.
740	Ryan Hernandez Contra Costa County Water Agency	The proposed pumping plant, southern forebay, and central tunnel corridor shown on Figure 1 of the NOP appear to be located within Contra Costa County limits near unincorporated Byron and Discovery Bay. The central tunnel corridor extends northerly near the outer edge of Contra Costa County limits. The southern portion of the project is partially located in Drainage Area 45 (DA 45) and partially in Drainage Area 110 (DA 110). These drainage areas define the watersheds for the East County Delta Drainages and Brushy Creek watersheds. The DEIR should discuss how the project would impact these drainage areas.
740	Ryan Hernandez Contra Costa County Water Agency	The FC District owns several properties and operates major drainage facilities in east Contra Costa County including channels and reservoirs for Marsh Creek, Sand Creek, Dry Creek, Deer Creek, and Kellogg Creek. If the project and its proposed facilities impact the capacities and operation of FC District facilities, or if the project needs access to any FC District property, the DEIR should note that a Contra Costa County Drainage and/or FC District Encroachment Permit might be required. At a minimum, the DEIR should list the FC District as an agency to notify.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR's analysis of adverse impacts should include potential drainage impacts caused by all construction activities including tunneling, dredging, construction of new conveyance facilities and access roads, and storage of borrow material. Tunneling may create an abundance of excess material that may require off-site storage, and the DEIR should analyze the changes in drainage patterns and flows caused by both temporary and permanent storage of excavated materials.

740	Ryan Hernandez Contra Costa County Water Agency	When the DEIR analyzes impacts in Contra Costa County, the Hydrology Section of the DEIR should include a study that uses Contra Costa County's hydrology method (HYDRO6) for unincorporated areas impacted by the project. Other commonly accepted hydrology methods were developed using runoff patterns of other regions that do not accurately model the Pacific Coast storm patterns experienced in Contra Costa County. The runoff results of other methods have proven to be significantly less than field observations of local storms made by the FC District and the United States Army Corps of Engineers (USACE).
740	Ryan Hernandez Contra Costa County Water Agency	If detention basin facilities are proposed; the DEIR should include a discussion of the basin design information (i.e., capacity, sizes of inlet and outlet structures, routing, etc.). A discussion of how maintenance of these facilities would be performed and funded should also be included.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should address the impacts of this project's runoff due to the increase in duration (length of time) of flows and the effect on creeks and channels downstream of the project. Whereas detention basins are capable of mitigating peak flows to pre-project levels, they increase the duration (length of time) of flows in the downstream watercourses, which saturate the channel banks and increase the potential for stream and channel erosion.
740	Ryan Hernandez Contra Costa County Water Agency	DA 4.5 and DA 110 have inadequate maintenance funding . The construction of this project should not result in added costs or reduction of revenue for Contra Costa County or the FC District. As one of the mitigation measures for the adverse drainage impacts of this project, this project should be required to identify a perpetual funding source for maintenance of the drainage area facilities required to serve the project and its ancillary facilities, such as access roads and fuel stations.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should discuss how the project would comply with the current NPDES (National Pollutant Discharge Elimination System) requirements under the Stormwater Management and Discharge Control Ordinances and the C.3 Guidebooks for the project's various local jurisdictions.
740	Ryan Hernandez Contra Costa County Water Agency	Portions of the project are situated in a Special Flood Hazard Area (SFHA) designated by the Federal Emergency Management Agency (FEMA) as Zone A or Zone AE. In addition, the project area incorporates areas designated by FEMA as "Areas with Reduced Flood Risk due to Levee." The DEIR should also analyze potential adverse impacts on nearby levees due to construction activities.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should discuss the impacts of grading in a floodplain and whether a Conditional Letter of Map Revision will be required.

740	Ryan Hernandez Contra Costa County Water Agency	The proposed intake locations between Courtland, Hood, and Clarksburg would reroute a portion of flows from the Sacramento River south to the Clifton Court Forebay, which may result in decreased flows through the Delta. The reduction in flows could result in increased sedimentation throughout the Delta tributaries in the eastern regions of Contra Costa County, which in turn could increase water surface elevations and create additional flood hazards. East Contra Costa County already has multiple areas designated as SFHAs, so the DEIR should include a thorough analysis on increased risks of flooding in all impacted tributaries along the eastern Contra Costa County limits.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should consider the effects of anticipated rising sea levels on the Delta tributaries and cumulative effects with the Delta Conveyance Project due to the diversion of water out of the delta. Sea level rise in the delta could lead to increased frequency, duration, and extent of flooding, shoreline erosion, and increased salinity intrusion further into the delta.
740	Ryan Hernandez Contra Costa County Water Agency	Contra Costa County and the FC District should be included in the review of all drainage facilities that have a region-wide benefit, that impact region-wide facilities, or that impact FC District-owned facilities. The FC District is available to provide technical assistance during the development of the DEIR, including hydrology and hydraulic information and our HYDR06 method, under the FC District's Fee-for-Service program. In addition, the FC District can provide copies of drainage area maps, upon request.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (E) The potential effects on Sacramento River and San Joaquin River flood management.
747	Jan McCleery Save the California Delta Alliance	Eastern Corridor Issue Summary: 2. Still has risk: a. Here the islands that are not as subsided as the Central Corridor, but it still means in the case of a levee break, the new haul roads and shaft sites would be under water. In 2004, Jones Tract suffered the largest recent levee failure. It was expensive and took months to reclaim the land. Building further east seems more prudent to get the construction out of the Delta island area. b. Soils are better than the Central Corridor for tunneling through, but still worse than the I-5 area. c. Note: At least this route would mean the tunnel wouldn't go under the railroad trestle and near Discovery Bay homes.

752	Amber McDowell Double M Farms	Delta river pumps. Extensions and/or additional pumps will need to be included in the EIR mitigation along with their greenhouse gas emissions. As similar to the previous versions of this project, the end result will be pulling water out of the river at a northern point which will result in lowering of the river water level. The projected drop in water level was 1-2 feet and with most of the Delta holding riparian rights, issues with the water level below those pump intakes will need to be addressed and mitigated for. I request that the EIR include the mitigation costs for the pump extensions for all of the Delta water users' thousands of pumps. In addition, the overall river water table will also be lowered and will require more Delta water users to actually have to pump more. Currently, the river water table on our island is about 3 feet which naturally sub irrigates some our crops. This has allowed the area to have lower greenhouse gas emissions from having less pumps and shorter pumping times. But as the river water table will be dropped and out of reach for these crops, Delta farmers will have to start pumping more water out of the river to water their crops, which will cause them to have to use more fuel and therefore increase greenhouse emissions. I request that the EIR include the additional greenhouse gas emissions from the additional required pumps and pumping time that will be needed to water crops due to the river water table drop that will result from this project.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effect, "Surface Water: changes in river flows in the Delta." There will be upstream and downstream of delta flow changes from the project that must be assessed. Construction dewatering discharge flow impacts must also be quantified, specified in location and timing and evaluated in the EIR.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Project Alternative: Through Delta Armored Levee Conveyance This alternative component has been studied by CalFed and others. There have been several innovations of this alternative component since the last time this project was evaluated. These include: • Levee construction of toe berms on the land side of the levees protect against potential levee liquefaction in the event of an earthquake that occurs when river stage elevations are high and levees are saturated with water. • Operable cutoff gates at confluences with other tributaries that protect from saltwater intrusion in the event of a levee failure. The combination of this alternative component with reconnection of Delta distributaries and with East and Central Delta Intakes makes the function of the Through Delta Armored Levee Conveyance alternative component much more robust and function differently and more resiliently than any previous analysis of this alternative component. Combination of this alternative component with improvement of existing delta levee systems to minimum adequate engineering standards and higher standards along the conveyance corridors, increased modernized levee monitoring and maintenance and fast response resources for levee breaches also improve the character, performance and reliability of this alternative component to levels never previously evaluated. Given these improvements and synergisms with other project alternative components, this alternative component deserves a serious and detailed evaluation.
767	Kelley Taber City of Stockton	Climate change models for the 2017 Central Valley Flood Protection Plan Update project a 35 percent to 50 percent increase in 200-year flood flows in the San Joaquin River tributaries by 2041-2070. The greatest risk to people and property in the San Joaquin River basin is in the Stockton Metropolitan Area. The U.S. Army Corps of Engineers has estimated that there are 235,000 people and $28.7 billion of damageable property in the 500-year floodplain in the Stockton area, which will largely become the 200-year flood plain with climate change. Estimates are that the Stockton area levees need $1.3 billion in upgrades simply to have adequate protection against current 200-year flood levels.

771	Melinda Terry California Central Valley Flood Control Association	Flood Chapter should analyze Substantial Alteration of the Location, Configuration, and Purpose of SPFC. Specific examples of anticipated DCP construction activities that may impact existing flood protection facilities and system design flow capacities: • Construct 2 intakes on Sacramento River eastside levee within 4-mile stretch; • Install multiple in-water cofferdams in Sacramento River and several Delta channels for intakes and barge loading facilities; • Construct cutoff walls down middle of levees to prevent seepage; • Increase sediment loading and removal at intake locations; • At each of the intakes, install multiple large gravity collector box conduits penetrating through the levee prism to convey flow to the sedimentation system on the landside; • Construct multiple barge landings on levees; • Modify approximately several miles of levees, on either a temporary or permanent basis; • Blocking, re-aligning, re-routing, and removal of state highways, county and private roads with levees underneath pavement; • Removal and local storage/disposal of millions of cubic yards of tunnel muck; • Removal and local storage/disposal of millions of cubic yards of dredged material; and • Installation of power lines over existing levees.
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: • Damage to levee integrity and stability from tunnel muck haulage and other construction activities (that go way beyond the design and intended use of these rural facilities), seepage and erosion scour, intensive pile driving, and increased subsidence and sink holes from dewatering; • Deflection and obstruction of flood flows in selected Delta channels due to cofferdam construction for three intakes and five barges, levee reconfigurations, sediment loading, and other construction activities that may redirect flows and alter flood risks throughout the ten-year construction timeframe;
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Impairment of ditches, pumps and other interior drainage facilities vital to the maintenance of low-lying Delta lands through the discharge from dewatering activities, disconnecting interconnected drainage systems, and seepage waters exceeding existing local capacity;
771	Melinda Terry California Central Valley Flood Control Association	Local Reclamation Districts (RDs) are responsible for daily inspection of levee conditions for issues such as cracks, slippage, encroachments, seepage, burrowing animals, etc., as well as for performing routine maintenance activities on and around the levees in order to meet USACE and FEMA standards required to be eligible for federal levee repair funding. DWR conducts levee inspections twice a year and the USACE conducts more extensive Periodic Inspections every 5 years of the SPFC project levees. There is significant concern that DCP construction will interfere with the ability of numerous RDs to conduct levee inspections, maintenance, improvements or flood fighting.

771	Melinda Terry California Central Valley Flood Control Association	Local RDs are also responsible for operation and maintenance of drainage facilities on Delta islands in order to keep the land reclaimed for farming. The existing drainage facilities on Delta islands are intricate networks of canals, ditches, pipes, and pumps which means they have been carefully designed to function as a system and located to work with gravity and the natural land contours and drainage patterns that exist on the Delta islands. Therefore, any disconnection or obstruction caused by DCP construction potentially renders the whole system inoperable, resulting in localized inundation.
771	Melinda Terry California Central Valley Flood Control Association	DCP construction would involve extensive excavation, grading, stockpiling, soil compaction, and dewatering, resulting in temporary and long-term alteration and disruption of drainage patterns, paths, and facilities. Dewatering would also result in significant volumes of discharge into local irrigation/drainage ditches, but there is no extra capacity in these local facilities and therefore cannot be used during DCP construction. Increased water volumes from 24/7 dewatering discharged into the rivers and waterways would increase surface water elevations locally, and erosion and scour on adjacent levees may create adverse impact depending on the velocities and volumes of water being discharged.
771	Melinda Terry California Central Valley Flood Control Association	CCVFCA recommends the EIR: • Examine existing conditions in terms of interconnected drainage systems and whether DCP construction will disconnect or disrupt the existing drainage facilities' ability to function/drain effectively; • Identify specific discharge locations, how many locations, the capacity of the discharge location or what its capacity availability is based on local usage/needs (winter drainage or summer irrigation) • Quantify the daily discharge rates and volumes from construction dewatering; • Identify how long dewatering and subsequent discharges will occur at each location; • Analyze changes in water quality that would occur at each discharge location.
771	Melinda Terry California Central Valley Flood Control Association	Risk from levee failures can be reduced, but not eliminated, so being prepared for a flood emergency is the best defense. This requires having an effective strategy for preventing failures with ongoing levee improvements and maintenance, protocols for responding with emergency flood fighting activities, a plan for evacuation, and local recovery after the flood event.

771	Melinda Terry California Central Valley Flood Control Association	Based on the flood history in the Delta, the DCP is guaranteed to experience at least one major flood event during the 14-year construction period. In addition to modification of the SPFC levee system, DCP construction will require extensive alteration of the existing Delta road configuration, including re-routing and blocking local roads and highway segments. These changes in transportation routes will impede flood fighting response and the safe evacuation of local residents. The inability to quickly flood fight and repair a damaged levee will result in loss of life and property, and could have the domino effect of causing neighboring levee failures if DCP construction activities/equipment prevent access to the levee break or impede movement of key flood fighting personnel and supplies. These impacts and emergency response measures need to be disclosed and mitigated in the EIR.
776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	The approved water flow standards for the Bay-Delta were last updated in 1995, despite a State Water Board requirement that they be updated every three years. These standards are now outdated. We request that, at a minimum, the DEIR should evaluate a range of possible flow standards, and an analysis of any cumulative impacts that may occur due to proposed changes to the system on San Francisco Bay and the Suisun Marsh. San Francisco Bay and Suisun Marsh have been experiencing a decline in important Bay species populations1. Declines observed under current water allocations could be worsened by potentially removing more freshwater from the system before proposed mitigation measures could become effective. We request that the DEIR identify underlying flow standards for the new Conveyance project, and if they are to be changed from current standards, how they may impact already critical species and related habitats. Diversions located further up the system may change water flows or have other impacts further down the system. The DEIR should address a range of operational standards for the entire system.

776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	We request that the DEIR include an analysis of the project impacts on the Delta and San Francisco Bay sediment system. USGS research shows that sediment flows into San Francisco Bay have been significantly reduced due, in part, to water control structures, flood protection, and hardening of rivers in the Delta (USGS, Schoellhamer et. al., 2013). Removing additional water from the system potentially reduces sediment transport in and through the system, which could affect turbidity, sensitive habitats, and water quality in the Bay and Suisun Marsh. Reduction in sediment transport into San Francisco Bay impacts existing habitats, including tidal wetlands, intertidal flats, subtidal shoals, and shorelines. Reducing sediment supply also impacts habitat restoration projects that rely on sediment travelling into the Bay, decreasing the ability of the projects to reach marsh plain elevations necessary to adapt to rising seas. Reduction in sediment supply also has the potential to increase the erosion of existing habitats and shorelines, resulting in loss of property and flood protection benefits they provide. Due to the potential for the project to reduce sediment supply further, we request that the NOP include an analysis of potential impacts on sediment sources and sinks from project construction and maintenance activities and potential impacts to the Bay and Marsh.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy ER P1 (Cal. Code Regs., tit. 23, § 5005) requires the State Water Resources Control Board's (Water Board) Water Quality Control Plan for the San Francisco Bay/Sacramento–San Joaquin Delta Estuary (Bay-Delta Plan) flow objectives be used to determine consistency with the Delta Plan for a project that could significantly affect flow in the Delta. This policy applies to the Project because the Project proposes new intakes at two locations along the Sacramento River, which have potential to significantly affect flow. The EIR should document DWR's analysis of how the Project may impact or alter Delta flows that are subject to the Bay-Delta Plan flow objectives. While these flow objectives are currently described by Decision-1641, the Water Board is undertaking updates to the Bay-Delta Plan. In addition, the ongoing voluntary agreements process could influence flow objectives on a timeline similar to the EIR. As part of a certification of consistency, the relevant flow objectives would be those in effect at the time of certification. Given this, we encourage DWR to consider updates to flow objectives during the EIR development process and analyze those as part of the document. Specifically, the following items related to Delta flow objectives may be relevant to include in the EIR: Documentation of ability to meet the requirements of the Bay-Delta Plan, as it exists at time of development of an EIR and at the time of a certification of consistency with the Delta Plan. Consideration of a range of operations and climate scenarios when conducting flow and compliance modeling. Documentation of model implementation and potential uncertainties.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy ER P4 (Cal. Code Regs., tit. 23, § 5008) requires levee projects to evaluate and, where feasible, incorporate alternatives to increase floodplains and riparian habitats. As described in ongoing discussions at the SEC, modifications of Delta levees will be required to construct two intakes and potentially for tunnel launch shafts and other ancillary facilities. Therefore, this policy applies to the Project.ER P4 requires evaluation of setback levees in several areas of the Delta, including the Sacramento River between Freeport and Walnut Grove, Steamboat Slough, and Sutter Slough. The EIR should evaluate the potential to incorporate setback levees at locations within these areas where Delta levees would be modified to accommodate Project or ancillary features, identify alternatives that would expand floodplains and riparian habitats, and describe the feasibility of such alternatives. Council staff encourage DWR to review the January 2016 report "Improving Habitat along Delta Levees".3 This report recommends habitat designs along levees that may provide greater benefits to target native species (with an emphasis on salmon and riparian birds).
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy RR P2 (Cal. Code Regs., tit. 23, § 5013) requires that "New residential development of five or more parcels shall be protected through floodproofing to a level 12 inches above the 100-year base flood elevation, plus sufficient additional elevation to protect against a 55-inch rise in sea level at the Golden Gate, unless the development is located within: (1) Areas that city or county general plans, as of the date of the Delta Plan's adoption, designate for development in cities or their spheres of influence; (2) Areas within Contra Costa County's 2006 voter-approved urban limit line, except Bethel Island; (3) Areas within the Mountain House General Plan Community Boundary in San Joaquin County; or (4) The unincorporated Delta towns of Clarksburg, Courtland, Hood, Locke, Ryde, and Walnut Grove, as shown in Appendix 7."
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy RR P3 (Cal. Code Regs., tit. 23, § 5014) restricts encroachment in floodways that are not either a designated floodway or a regulated stream. RR P3 states that "no encroachment shall be allowed or constructed in a floodway unless it can be demonstrated by appropriate analysis that the encroachment will not unduly impede the free flow of water in the floodway or jeopardize public safety". The EIR should describe how construction activities and operations of Project and ancillary features would not impede the free flow of water in the floodway or jeopardize public safety.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy RR P4 (Cal. Code Regs., tit. 23, § 5015) states that no encroachment shall be allowed or constructed in the floodplain areas specified within the regulation – including the Yolo Bypass, the Cosumnes-Mokelumne River Confluence, and the Lower San Joaquin River Floodplain Bypass area – unless it can be demonstrated by appropriate analysis that the encroachment will not have a significant adverse impact on floodplain values and functions. The EIR should describe how construction activities and operations of Project and ancillary features would not result in encroachment on a designated floodplain.
817	Thomas J. Slater RD 999	This project is anticipated to take over 14 years to complete. With the coffer dams scheduled to help construct the diversions and barges staged at each location, the potential to block winter flows is something that should be studied. It is not acceptable to just say that possible flows being restricted will be mitigated. Mitigation needs to be sufficiently described and certain to be enforceable. This is something that was conspicuously absent in the first EIR.
817	Thomas J. Slater RD 999	It is unimaginable to think that a barge or barges sitting in the Sacramento River during a large flood event will not adversely obstruct flow that is critical to flood protection. Flood protection in the Delta should be analyzed in the ERI to the satisfaction of all the local LMA's and the Central Valley Flood Protection Board.
826	Melinda Terry North Delta Water Agency	Comments herein are intended to facilitate DWR's compliance with the 1981 Contract and to ensure that any significant adverse impacts to water users and Delta channels associated with the Proposed Project are properly described, analyzed, and mitigated in accordance with applicable law. The DCP EIR must acknowledge the potential for construction activities and conveyance operations to have adverse impacts on surface and groundwater diversions facilities and should consider whether the damage to water users from Project activities is a violation of standards in CEQA and NEPA governing disclosure, weighting of impacts, and cumulative effects on environmental and human resources. Adverse impacts within the project area to existing water quality, water surface levels, local diversions, and flood flow velocities that can erode levees should specifically be identified and addressed in the EIR.

826	Melinda Terry North Delta Water Agency	There are thousands of individual diversion pipes, primarily agricultural siphons located in the Delta channels, and many municipal and agricultural groundwater wells that will need to be protected from construction and operation of the Proposed Project. The EIR should provide an adequate analysis of the project's impacts to water supply and quality, water diversion infrastructure, and to the water channels and embankments. DWR should commit to immediately repair any damage to existing water supply infrastructure, including underground wells, caused by the Proposed Project construction and operation; and be required to provide alternative water source (temporary or permanent) to impacted water users, if necessary. The Water Supply Chapter in prior BDCP and WaterFix EIRs failed to include a section describing the impacts to local water supplies (groundwater wells and surface diversions) within the project area as a result of construction and operation of new water conveyance and export facilities.
826	Melinda Terry North Delta Water Agency	Avoid or mitigate interference with operation and performance of local underground wells and surface water diversion infrastructure.
826	Melinda Terry North Delta Water Agency	Analyze how requirements imposed on operation of the project, such as spring outflow criteria, will be met when DCP Project facilities are operational and whether water stored in upstream reservoirs for use to maintain 1981 Contract's salinity criteria will be imp acted.
853	Susan Alexander	The EIR should analyze alternatives that would increase Delta outflow and reduce water exports as compared to current conditions in the Delta.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft.: Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft.: Decreased water flow causes stagnation and invasive plants to increase, reducing navigable waterways
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta.
905, 906	Mark & Linda Lambert	6). Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta.
1001	Walter Hoppe	The entire northern area of this proposed project lies within the FEMA 100 year floodplain. How this project will impact this floodplain must be addressed in the environmental assessment.

1001	Walter Hoppe	The floodplain problem north of the Mokelumne River has increased over time due primarily to downstream State supported levee improvement projects. Upstream urban development also contributes to increased downstream flooding in the Beach Stone Lake area. This project will have a significant adverse environment impact as related to the flood problem in the north of the Mokelumne River if not mitigated. The flood issue must be addressed in the environmental review.
1001	Walter Hoppe	Surely all above ground permanent infrastructure will be required to be constructed above the 100 year flood elevation. This construction will take up critical flood storage area including increasing flood risk to adjacent areas. Any loss of flood storage must be mitigated to 100% including during construction.
1001	Walter Hoppe	One positive aspect of this proposed conveyance system is that it could be designed to convey flood waters from the Beach Stone Lake area. Designed as a dual conveyance and flood control project would make this project more acceptable. The Sacramento River east levee would have to be reconstructed to acceptable FEMA standards. This levee reconstruction is inevitable as the State of California is facing potential litigation under the Paterno vs. State of California principles.

Table D-18. Comments Regarding Groundwater

Letter	Commenter Name, Affiliation	Comment Text
23	Ryan Hernandez Contra Costa County Water Agency and County of Contra Costa	It is noted that the project is included in the boundaries of one or more groundwater sustainability agencies (GSA). The project may be subject to GSA approvals.
200	Jim Williamson	What will people do with their wells that are only 80 feet deep when we have no freshwater in the Delta?
248	Tom Williams	Provide review of all eligible/suitable areas of Groundwater Resources for recharge and production using "Delta-Conveyance waters" – Sources and Destinations
331	Sol Jobrack Stockton City Council	We recently adopted a new groundwater plan. And one of my immediate concerns is what's the impact on that. Like I said I'm not a water expert, but something tells me if you divert water away, and I looked at that map, it completely avoids Stockton. Water surface water and groundwater are connected. So if you're diverting water away from our ground basin water which we rely on for farming, and in the event of a drought, we're relying on that water to support our communities. What's going to happen to those basins? Are we going to have to change our groundwater sustainability plan now because we have to divert water?
367	Mark Goble	If you're digging under water and peat soil, you're gonna have to inject grout, so you're gonna kill the groundwater with that.
380	Dave Stirling	Concerned about dewatering of groundwater
416	Tressa Dahlberg North Delta Cares	Our concerns involve the dewatering or lowering of the groundwater surrounding each intake structure, during construction and how that will effect our water supply, wells, farmland community, and way of life. The scope describes the lowering of the groundwater 30 feet to accommodate construction. It calls for a dewatering within a one mile radius, installing pumps at approximately 75 feet apart within that radius and treating that water prior to returning it to the river. That would mean there would be around 4,956 pumps to dewater the groundwater, including a treatment facility on each side of the river. All of the associated infrastructure would eliminate farming in the area. The land may never completely dewater. Underground rivers could flow into the area for years. Water facilities would need to run 24/7 for over to years or more before the target feet of groundwater reduction is achieved.

432	Bob Saunders	Essentially, also, it's been said by the Center For Food Safety in 2015 during a comment on the tunnels' EIR– -- and they said many of most of the new water transfers will involve groundwater substitution, increased groundwater pumping to facilitate water sales, and those will result in depleted aquifers and groundwater subsidence. It will also result in water in the streams and rivers, the surface waterways of the Sacramento Valley are tightly connected to groundwater, groundwater surface water rechargers, groundwater aquifers. Well, groundwater provides for streams and rivers. Today, less than 30 percent of the consumptive water use in the Sacramento Valley is from groundwater. That percentage will certainly rise with the construction of the tunnels and the increased water transfers that will result, and with it land subsidence will increase and the watering of rivers and streams will increase. The tunnel project was a bad idea when they called it the Peripheral Canal. It was a bad idea when it was the Twin Tunnels. It's a bad idea for a single tunnel. And if anybody wants to come back to do half a tunnel, it will be a bad idea with then. We don't need it. We don't want it. And there are far better ways of doing what's necessary, looking towards a future, than to disrupt the life, and the culture, and the history, and the many people who rely on the existence of the tunnel and the way it is. We need to leave it alone.
505	Lenora Clark	We are concerned with the lack of surety that the plan will address quality of water.
518	Mariah Looney Restore the Delta	Groundwater wells that supply drinking water will become polluted and loaded with salt. Stockton's drinking water plant will be left with water loaded with pollutants.
549	Maggi Baum	Where will the tunnel start and how does this affect wells?
576	Kelley Taber Sacramento County Water Agency	The long-term decrease in surface-water flow resulting from Project diversions could have an impact on the hydraulic connection between the Sacramento River and groundwater in the South American Sub-Basin. Based on existing conditions and current groundwater pumping rates, additional decreases in surface flows could reduce current levels of natural recharge resulting in groundwater elevation decreases, groundwater quality degradation, and adversely affect stream/aquifer interactions. The EIR must thoroughly analyze the Project's potential impacts on stream-groundwater aquifer interactions upstream and downstream of the proposed Project diversions, including whether the Project would lower groundwater levels beneath the Sacramento River and in nearby domestic wells, and by how much.

576	Kelley Taber Sacramento County Water Agency	CWA operates two groundwater wells that serve as the only source of drinking water and fire suppression for residents in the Town of Hood (Hood). The wells are within close proximity to the proposed Project facilities. The Hood wells extend approximately 200-350 feet below ground surface, which is below the depth of the proposed Project tunnel. SCWA has significant concerns about the tunnel's potential impact on Hood's wells. If there were a small alignment error, tunneling construction could damage the new Hood well hole. Construction could disrupt the existing geological structure and recharge capability, particularly the aquifers. Tunnel construction and operation vibrations could modify or collapse the aquifers, reducing productivity of the new Hood well, which is Hood's primary water source. This modification or collapse could permanently reduce well production since the well hole screens may no longer align with the geological water bearing structures. Further, vibrations from construction and operations have the potential to displace or dislodge existing contaminates, causing a significant adverse change in water quality. The EIR must analyze the potential impacts on the Hood wells due to construction and the potential degradation of the groundwater aquifer that the wells draw from due to partial or full soil liquefaction. Any impacts to operational reliability must be clearly mitigated. DWR should consult with SCWA as it develops the EIR so that impacts can be avoided through Project design. The EIR also must address the potential for adverse effects to the groundwater aquifer stability from Project construction and operation. Specifically, the EIR must accurately describe the groundwater aquifer characteristics in and around Hood, and evaluate how the groundwater aquifer and water supplies might be affected by any compaction or alteration of groundwater flow paths. Impacts to local infrastructure or groundwater aquifers must be clearly avoided or mitigated.
598	Bill Emlen Solano County	Ecosystems that are dependent on groundwater and interconnected to surface water rely on both groundwater levels being close enough to the land surface to interconnect with surface water. The Project proposes dewatering areas to construct the massive tunnel and access systems. Areas surrounding dewatering points will be affected by the work which can directly impact ecosystems dependent on groundwater. Furthermore, dewatering and installation of slurry walls may impact groundwater flow and water quality that is utilized by shallow water supply wells located near the Project's construction areas. The EIR should fully analyze aquifer conditions and how dewatering and slurry wall installation will affect long-term groundwater flow and water quality on shallow water supply wells and groundwater dependent ecosystems. In addition, due to seasonal and interannual variability of groundwater levels multi-year and seasonal groundwater conditions should be utilized in order to ensure that adverse impacts are avoided.

610	Henry Kuechler Reclamation District No. 2060	De-watering from construction activities will have extensive impacts on immediate and surrounding areas of the intake facilities and tunnel alignment. The Delta islands have a high groundwater table due to their proximity to the river. De-watering activities can result in land subsidence within the Reclamation District and surrounding levees. A quick drawdown of water can result in sloughing o the levees and create instability. The cone of depression from de-watering can extend far beyond the project area, impacting domestic wells, which is the primary water source for residences within the Delta. These impacts will have devastating effects on the Delta and its legacy communities.
612	Warren Bogle Reclamation District 150	De-watering from construction activities will have extensive impacts on immediate and surrounding areas of the intake facilities and tunnel alignment. The Delta islands have a high groundwater table due to their proximity to the river. De-watering activities can result in land subsidence within the Reclamation District and surrounding levees. A quick drawdown of water can result in sloughing o the levees and create instability. The cone of depression from de-watering can extend far beyond the project area, impacting domestic wells, which is the primary water source for residences within the Delta. These impacts will have devastating effects on the Delta and its legacy communities.
612	Warren Bogle Reclamation District 150	Dewatering for construction and changes to groundwater levels associated with project operations threaten existing spray wells
705	Roger Mammon	Will tunneling under the Delta destroy existing aquifers that Delta residents rely on for drinking water? How will they be compensated if it does?
715	Daniel Wilson Reclamation District 3	De-watering from construction activities will have extensive impacts on immediate and surrounding areas of the intake facilities and tunnel alignment. The Delta islands have a high groundwater table due to their proximity to the river. De-watering activities can result in land subsidence within the Reclamation District and surrounding levees. A quick drawdown of water can result in sloughing o the levees and create instability. The cone of depression from de-watering can extend far beyond the project area, impacting domestic wells, which is the primary water source for residences within the Delta. These impacts will have devastating effects on the Delta and its legacy communities.
729	Erik Vink Delta Protection Commission	The BDCP/WaterFix EIR acknowledged groundwater losses due to construction dewatering and implementing its environmental commitments but did not identify specific measures to meet preexisting or future water demands of affected parties. These impacts to groundwater should be assessed and specific measures to avoid or mitigate them should be proposed.

730	Reclamation District 551	One of RD 551's main efforts is to remove drainage water from the district, primarily by running the district pump stations and drainage ditches. Most of the water currently comes from precipitation events, seepage through the levees, and irrigation tailwater, though district farmers recirculate and reuse water efficiently, minimizing the amount of water that must be pumped out of the district. Any seepage of water into the soils or canals of the Pearson District as a result of a water conveyance facility must be addressed in the EIR and properly mitigated pursuant to CEQA. The proposed Project contemplates potential intake sites and north tunnels that would run through or near Snodgrass Slough and Pearson District. It is unclear whether water is anticipated to seep from an intake pipe in a way that would impact Pearson District and contribute to the local water table, possibly requiring pumping off the island.
730	Reclamation District 551	Every effort must be made to prevent seepage from the proposed conveyance facilities: the forebay, tunnels, and all other conveyance or regulating facilities will need to be lined with material that provides the lowest achievable range of seepage, regardless of cost. The Project must also include contingency measures to address incidental seepage. These measures should include, at a minimum: (1) water table and soil moisture detection devices throughout the entire district so that conditions can be constantly monitored; (2) relief wells along the tunnel alignment and forebay so that any seepage can be captured and pumped back to the forebay or the Delta channels, and (3) a response plan that will require Delta Conveyance Project operations to cease long enough to locate and fully repair any leaks or any other cause of high-water elevation conditions.
730	Reclamation District 551	De-watering from construction activities will have extensive impacts on immediate and surrounding areas of the intake facilities and tunnel alignment. The Delta islands have a high groundwater table due to their proximity to the river. De-watering activities can result in land subsidence within the Reclamation District and surrounding levees. A quick drawdown of water can result in sloughing o the levees and create instability. The cone of depression from de-watering can extend far beyond the project area, impacting domestic wells, which is the primary water source for residences within the Delta. These impacts will have devastating effects on the Delta and its legacy communities.
740	Ryan Hernandez Contra Costa County Water Agency	The EIR should analyze Impacts to the East Contra Costa Groundwater Sub basin.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effects, "Groundwater: potential effects to groundwater levels during operation." There are groundwater impacts from construction dewatering and from ongoing variability in SWP water supply deliveries which must be quantified and assessed in the EIR.

771	Melinda Terry California Central Valley Flood Control Association	Primarily limited to interior portions of the Central Delta, land subsidence has slowed in recent years in the Delta, which has allowed landowners and reclamation districts to manage it over time. However, DCP construction could potentially increase land subsidence and sinkholes as a result of the widespread and intensive 2/47 dewatering and pile driving that will occur during the 14-year construction period. With dewatering pumps placed every 50 to 75 feet around the entire perimeter of all the DCP facilities under construction, each pumping between 240 to 10,500 gallons per minute, groundwater will be lowered several feet on a large radius around each pump. This amount of intensive, long-term dewatering has the potential to destabilize the soils, including levees, resulting in sink holes and subsidence
771	Melinda Terry California Central Valley Flood Control Association	Damage to the existing interconnected drainage and irrigation systems due to sinking land will increase localized inundation of crops, fruit packing sheds, and homes. These individual and cumulative impacts need to be analyzed, disclosed, and mitigated.
771	Melinda Terry California Central Valley Flood Control Association	The EIR should also include a map depicting the levees and drainage facilities (ditches/pipes/canals/pumping stations) that may be exposed to subsidence or liquefaction due to dewatering activities.
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	Existing conditions of Sacramento Valley groundwater The DEIR must address the consequence of declining Sacramento Valley groundwater levels. In past analysis for the Bay Delta Conservation Plan and the WaterFix, there was an absence of accurate and detailed information that describes the Sacramento Valley groundwater conditions. The 2014 DEIS/EIR quite inaccurately stated that, "A portion of this applied water, and the remaining 13.9 MAF of runoff, is potentially available to recharge the basin and replenish groundwater storage depleted by groundwater pumping. Therefore, except during drought, the Sacramento Valley groundwater basin is "full," and groundwater levels recover to pre-irrigation season levels each spring. Historical groundwater level hydrographs suggest that even after extended droughts, groundwater levels in this basin recovered to pre-drought levels within 1 or 2 years following the return of normal rainfall quantities." (p. 7-13) In complete contradiction of "full" or "recovered" groundwater basins is a summary of conditions in the Durham area of Butte County that finds that while water levels may recover after dry to drought periods with intense use, wells aren't returning to previous levels, but moving steadily in a downward trajectory.1 Additionally, even the Yuba River area, often touted by state and federal agencies as a successful conjunctive use program, it takes 3-4 years to recover from groundwater substitution in the south sub-basin2 although the Yuba County Water Agency analysis fails to determine how much river water is sacrificed to achieve the multi-year recharge rate. We point DWR to more examples that contradict long-term predictions of "full" and "recovered" groundwater basins that are found in your own groundwater maps.3 1 Buck, Christina 2014. Groundwater Conditions in Butte County. 2 2012. The Yuba Accord, GW Substitutions and the Yuba Basin. Presentation to the Accord Technical Committee. (pp. 21, 22). 3https://data.cnra.ca.gov/dataset/northern-sacramento-valley-groundwater-elevation-change-maps

814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	How many water wells are known to occur in the Central and Eastern Tunnel Corridors? Answer: We had to search the well log database by township, range and section. Given this is an agricultural area, there are likely a large number of water wells.
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	o What analysis will be done to evaluate whether the tunnel creates a barrier to groundwater flow and what may be the impacts from that barrier on the water supply of Delta farmers? Will the tunnel barrier alter the flow of groundwater? If yes, which aquifers will be affected? How will the water wells in the Delta be impacted? Will wells have to be relocated or deepened to accommodate the tunnel impacts to groundwater flow? Will the tunnel barrier change the chemistry of the groundwater? In particular, will the barrier cause an increase in salinity due to restricting, or re-directing the outward flow of fresh groundwater?
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	What monitoring of groundwater levels, flows and quality will be done prior to beginning construction of the tunnel, during construction, and post-construction? Who will be in charge of constructing monitoring wells and conducting the monitoring groundwater? What water quality constituents will be monitored? Who will bear the cost of groundwater monitoring, before, during and particularly after tunnel construction? How long will groundwater quality and level monitoring be done following tunnel construction? What mitigation measure will be implemented to remediate groundwater should the tunnel cause a detrimental change in groundwater quality? What are the triggers for implementing these groundwater remediation mitigation measures? Who will bear the cost for implementing groundwater remediation mitigations?
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	Will changes in the flow of groundwater caused by the tunnel change the potential for liquefaction in the Delta? What studies will be done to evaluate the potential for liquefaction in the Delta, pre-and post-tunnel construction? What mitigation measures will be implemented if the tunnel has the potential for increasing liquefaction? What are the environmental impacts of implementing these liquefaction mitigations? Who will bear the cost of implementing and maintaining any liquefaction mitigation measures?
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	Groundwater depletion and subsidence in the San Joaquin Valley The DEIR must disclose and analyze the mining of groundwater and the resulting subsidence in the San Joaquin Valley. The USGS exposes this form of groundwater exploitation in the San Joaquin and Santa Clara Valleys (1999) in Circular 1182 entitled Part I, “Mining Ground Water.” More recent research by Michelle Sneed expands on the impacts from groundwater mining in the San Joaquin by disclosing the extent of historic and current subsidence levels4 as does work by Devin Galloway and Francis S. Riley.5 4 Sneed, Michelle et al. 2013. Land Subsidence along the Delta-Mendota Canal in the Northern Part of the San Joaquin Valley, California. http://pubs.usgs.gov/sir/2013/5142/ 5 Galloway, Devin and Francis S. Riley, unknown date. San Joaquin Valley: Largest human alteration of the Earth’s surface.

Table D-19. Comments Regarding Water Quality

Letter	Commenter Name, Affiliation	Comment Text
1	Dee Joyce	Will you quit when the Delta water environment is officially considered Dead? When all aquatic life ceases because the pH balance, the oxygenation the salt balance has been irreparably destroyed? Look to how the Owens Valley has died due to the greed for its waters of those farthest away from it.
7	Michael Greggans	As a Discovery Bay resident for twenty years, we have seen toxic algae in the water behind our home for the past five consecutive years. Most likely, this is due to barriers being placed in the San Joaquin River by the previous governor, to slow the water flow in anticipation of his twin tunnel legacy dream. Regardless of one or two tunnels, the amount of water removed from the Delta will signal the beginning of the end of our valuable Delta ecosystem. There is no mitigating toxic algae when the existing below normal flow of water in the Delta becomes reduced even more by a tunnel. The algae smell is nauseating, contributes to eye and lung problems, and will make humans sick when swimming, and can kill dogs and cats. This is the tip of the ecological nightmare iceberg that will be created if this tunnel is built.
11	David Gloski	Under Public Health it is more than a mosquito-borne disease issue, you need to include effects of this project on the very hazardous summertime algae bloom issues in the south delta. With less water conveyed through the delta, it would seem this condition will get worse as a result of the project.
11	David Gloski	I would like to see the project consider, a capability for water in the southern forebay to be able to be returned to the south delta during times of hazardous high algae to reduce the public health problem if this indeed does act as a mitigation. This should be analyzed not just to be used when the problem is already manifested but to be able to operate in a way to prevent the condition from occurring.
20	Bill Emlen Director, Department of Resource Management, Solano County	In addition, the County would like to ensure that, among the myriad of items analyzed, the long-term impacts to levees during construction/added truck traffic, and even longer-term reduced water quality and quantity to intakes in Solano County due to reduce freshwater in the system, be sufficiently and thoroughly studied and mitigated.
29	Hope Salzer	The EIR must analyze the tunnel's cumulative and collective impacts, with particular focus on: water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta;
32	Robin Durston	Water quality issues around pollution, discharge from the San Joaquin River, and the growth of Harmful Algal Blooms in the Delta have not been resolved.
48	Libby Lucas	Request you also address these specific areas of concern: - saltwater intrusion's current inbound extent and anticipated reduced Sacramento River flow induced levels
48	Libby Lucas	Request you also address these specific areas of concern: - what degree of flow diversion will not degrade water quality available to Delta residents and increase saltwater intrusion

53	Leland Frayseth	Please study the Copernicus satellite photos in my Scary Tunnel video https://youtu.be/rvm7r4hYcWs and address the concerns caused by starving the freshwater flows of the gray Delta areas highlighted in the video and no freshwater flushing of the Delta into the ocean.
67	Aaron Lowe	Our city water comes from wells. Common sense seems to suggest a risk of higher salinity levels in well water as the water table lowers and the marshlands drain away from pumping our water to the Southwest (SoCal, NV, AZ and CO). What mitigation plans are in place to minimize this possibility? I am downstream from Courtland.
104	Paul and Lynda Roy	This single tunnel project should be proven to allow adequate fresh water supply to the Delta; and not allow salt water intrusion to upset the health of Northern California people, nor the plant and fish populations. I'm old enough to remember the intrusions from drought years; it would be a gravely irresponsible decision to set that in motion again.
116	Virginia Phelps	It isn't just the fisheries and the environment that need freshwater flows. Without adequate freshwater flows through the Delta, export water can be too salty for agriculture, both in the Delta and south of the Delta. Apparently urban export users have also had to treat water that is too salty.
116	Virginia Phelps	Also, inadequate freshwater flows through the Delta cause toxic harmful algal blooms (HABs), which are a serious health issue in San Joaquin and other Delta counties.
132	Joe Smithonic Contra Costa County Flood Control and Water Conservation District	The DEIR should discuss how the project would comply with the current NPDES (National Pollutant Discharge Elimination System) requirements under the Stormwater Management and Discharge Control Ordinances and the C.3 Guidebooks for the project's various local jurisdictions.
136	Mike Ackley	Can our waterways be dredged?
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Reasons this project should not be built: Salinity is now an issue in several parts of the Delta and will become worse with climate change; it could become even more of an issue with this project. A farmer just south of Rio Vista raises wine grapes, alfalfa, sheep/lambs and wheat and barley. During the last drought they could not use river water at all because of the salinity. Even now there are peaks in salinity that limits the times and duration of their irrigation.
145	Meredith Cooper	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta;

161	Dr. Steven White	ISSUES THAT SHOULD BE EXAMINED IN ANY ENVIRONMENTAL IMPACT ANALYSIS OF THE "DELTA CONVEYANCE PLAN". With respect to "water quality", for example, important concerns that need to be analyzed and mitigated include (but are not limited to) the following --The effect of reduced freshwater flow on salinity gradients in the Bay and Delta [29, 2, 30] and the corresponding changes in abundance and distribution of animal, plant and microbial population– --The effect of reduced freshwater flow on the concentration and distribution of potentially toxic organic pollutants, metals and/or nutrients discharged into the Bay and Delta [25, 2] and the corresponding effects on animal, plant and microbial population– --The effect of reduced freshwater flow on overall turbidity and the nature and distribution of sediments [18, 2] in the Bay and Delta and the corresponding effects of animal, plant and microbial population– --And, while it is only peripherally related to "water quality", will the proposed reduced freshwater flow into the Delta have any effect on water temperature gradients within the Bay and Delta? If so, significant thermal stresses to sensitive animal, plant and/or microbial populations should be evaluated and mitigate– --For that matter, since changes in salinity, the concentrations of pollutants and/or nutrients, changes in turbidity etc. are all known to affect a number of animal, plant and microbial populations, how will the effect of reduced freshwater flow into the Bay/Delta system on the abundance and distribution of invasive species [2, 18] be evaluated?
163	Peter Aughney	Please stop dreaming of taking the water that prevents salt water intrusion miles into the delta, your going to destroy an ecosystem that has been working for thousands of years and destroy it only to fill up swimming pools in Southern CA.
167	Tracey Licerio	What is the water quality baseline of the Sacramento and Trinity Rivers?
167	Tracey Licerio	How will this affect the level of arsenics in Shasta Lake?
167	Tracey Licerio	How will this affect pollution discharged into the San Joaquin River?
171	William Roltsch	Exposure of the environment to mercury is of great concern. I hope to see clear evidence that substantial mercury is not unearthed and released during any digging process. Can the excavated soil be safely used for berms, etc. or will it be hazardous?
185	Susan Wallace	Comment raises concerns regarding potential impacts to water quality to those who rely on fresh water from the delta as a result of north delta diversions. Specific concerns raised are pollutants, salts and algae.
186	Phyllis Johnston	Comment raises concerns regarding saltwater intrusion from San Francisco Bay.
195	David Fries Conservation Chair San Joaquin Audubon Society	The Delta Reform Act mandates that flow criteria for the survival of the Delta must be determined before the Water Board approves potential operation of a new conveyance system through a change in point of diversion. No construction can be commenced until the change in point of diversion is approved. Any decrease in flow in the south and central Delta that will contribute to increased toxic algae blooms and perpetuation of invasive species must be avoided.
196	Jasmine Leek Third City Coalition	Stockton community does not accept any proposals that negatively impact water quality; community has suffered from environmental degradation

204	Raven Stevens We Advocate through Environmental Review (WATER)	How will redirecting the fresh water flow, into the proposed Tunnel effect the water quality in the Delta and to surrounding areas? The EIR must analyze the impacts to salinity, pesticide levels, toxic hot spots, mercury and ability of all wildlife to survive more changes
205	Frank Toriello We Advocate through Environmental Review (WATER)	Operations of the DCP would increase DWR's ability to capture water during high flow events, the same as with the proposed Sites Reservoir. Along with increased impoundment behind a raised Shasta Dam, these diversions would result in a great decrease in water quality, resulting in increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to a lack of seasonal high freshwater floes in the Delta; with resulting detrimental impacts on the aquatic life in the San Francisco Bay and Delta. Already there's a sever drop in the numbers of returning Chinook salmon.
265	Molly Culton Sierra Club of California	The EIR must analyze the tunnel's cumulative impacts … including salt water intrusion…
265	Molly Culton Sierra Club of California	The EIR must analyze the tunnel's cumulative impacts … including … water quality, including the effects of increases in salinity, toxic hot spots, pesticides, mercury and other pollutant discharge that 'on't be cleaned out due to the lack of fresh water flows in the Delta.
266	Michael DiMartino Alliance for Resilient Communities	If you're here to talk about water, let's talk about the environmental toxins that are contributing to the water. So very quick, let's talk about bad design. How many of you have heard about the Paradise fires? Bad design. Because we didn't look at indigenous land management practices. Okay? Let's look at what's happening with the e-Coli and algae blooms in the American River and the Yuba River, because the rivers are being depleted because of not just dams, but because of water misuse and also because of climate change. Going down the line, let's look at overdevelopment. Let's have common sense. Let's consult and talk to people like the Bechtels and other organizations that are trying to overdevelop Central Valley. And it's a desert. It's not meant to be developed. It's meant to bring back the wetlands and the way that this environment is supposed to be maintained. Let's look at agriculture, permaculture practices. Let's talk with the residents. Let's look at what's happening with the almond orchards. Let's consider dry farming. Let's consider all the things you can do to regenerate the groundwater which is contributing to the drought in California. Let's exercise common sense. So really quick, Let's look at what's happening with fracking with Governor Brown and Jerry Newsom. Jerry Brown and Governor Newsom, they both approved fracking. Let's look at what's happening with environmental toxins from Monsanto and Glyphosate and the lobby that they have. Al' I'm saying -- I have a lot more to say. Let's look at a future versus dollars and some privatizations pocket and how it's going to affect all of us. And I Don't care if you're a developer or you're a child, your future and your children will be affected.
287	Susan Wallace	Many of the processes seem to be ignoring the long-term effects on the Delta and the people who depend on the Delta. Taking water there is going to reduce river flow into the Delta, with long-term effects such as increasing salinity, reducing the removal of pollutants, increased algae blooms, and I'm hoping that as you look at this process, you start looking into more benign ways to encourage agriculture in the south without destroying the ecosystem of the Delta.

292	Bruce Campbell	What is the impact of each alternative on a worsening situation of toxic algae in the Delta region? Please evaluate each alternative as to likely impact on toxic algae growth within the proposed tunnel and in the Sacramento San Joaquin Delta region. Please also consider oxygen production in the entire Bay Delta region in your alternatives
323	Jeff Balmores	This project also affects our water quality due to the dumping of polluted sledge soil such as boron and mercury, which is immoral. These toxins will bioaccumulate in many of the wildlife in the Delta and affect the area's residents' rights to have access to the waterways and disallow them to have a form of recreation, which is granted under the California Constitution.
323	Jeff Balmores	As for water pollution, the toxins can be transmitted to those who come in contact with the Delta water, drinking tap water, and through seafood that they're eating, such as the fisherman eating the fish in the Delta, and cause illnesses such as diarrhea, cholera, and hepatitis.
328	Niria Alicia Garcia	I am one of the organizers of the Run4Salmon Run, and I've been on that river for the past five years praying praying for that water and seeing all of the pollution that goes into there.
330	Sharon Jarvis	My chief concern is about the water for Stockton.·
330	Sharon Jarvis	And, particularly, for our underserved community, south Stockton, where people are already swimming in the sloughs with the toxic green algae. If this project goes through, we're going to have more of that algae. We're going to have more of that algae dust in the air that we're all going to be breathing. It will be even worse in south Stockton' I'm sure it will get to the Smith Canal and all of the other canals that we have in this area.
331	Sol Jobrack Stockton City Council	I often take the ACE train to the Bay area. People are very familiar with that. One of the places that you go through is the salt water plains that are out there. And I would often talk to old timers that had a lot of experience out there, and they tell me how great it used to be a long time ago with all the hunting, the wildlife and everything that went out there.· And if you look at what policy makers are having to do out there now is they're having to make drastic and expensive changes. They're trying to fix the side effects of what happened with all the saltwater intrusion. So if were to happen here, are we going to look like what it looks like out there? That's not a community I want to live in.
333	Roger Kelly	We need water from the Sac to help flush out the Delta. The water quality is getting worse every day.
333	Roger Kelly	When I recreate out there, there's many areas we can't even go to because of the toxic algae. They have to put signs out. The people who don't have the ability to be out on a boat and maybe get the better quality water, small children down there swimming downtown, they're going to become sick. We need the water to flush this stuff out.
333	Roger Kelly	But I also do water testing for the California Water Quality Board, and the e coli level in many parts of Stockton including the Calaveras River is at the highest recordable levels. And it's only going to get worse if we start taking all of the water from Sacramento, and then we're going to start stretching out the water from the Hogan and different reservoirs; and the water quality is going to become– we're going to have a toxic cesspool out there, and the salt intrusion.

333	Roger Kelly	What about our farmers? What about this water that I'm talking about that-- the algae bloom, the e coli, when it spreads out into the main channel and we're irrigating our crops?
335	Jane Wagner-Tyack League of Women Voters of San Joaquin County	We do not see that high water quality standards will be protected in the Delta and the estuary, or that strong binding environmental safeguards will protect all in-stream uses.
336	Tafari Lee	It's going to make it harder for them to acquire clean water, and it's going to make it hard for them to acquire water in general.
340	Dan Nomellini Jr. Central Delta Water Agency	The second thing I want to talk about, the most disturbing thing to me is the abandonment of maintaining Delta water quality. Right now, as you know, so long as the projects export water from Tracy, they need to keep the entire Delta fresh, because that's where they're pulling their water from. Once you build a physical facility that lets them take the water to north Delta, you've destroyed that common interest in keeping the Delta fresh, and we can't allow that to happen. We're not going to be able to legally control how they operate that facility. So the goal is to not allow them to physically construct it. Now, this has been our fear that once they construct it, all of a sudden, they're going to stop caring about Delta levees; they're going to start changing the water quality criteria. They have the political power to do that. We believe they will. So that was our fear.
343	Margo Praus Sierra Club of California Member	The tunnel will divert up to two-thirds of the fresh water flowing into the Delta from the Sacramento River. That will have a huge impact on Delta water quality. This is our neighborhood. The EIR should assess all the water areas and determine protections that would be necessary for all resources
346	Mariah Looney Restore the Delta	Many young people in the Delta area will also often tell you that they don't want contact with the water, especially used in south and east Stockton. They can see the degradation of our rivers and sloughs for themselves. And they see our degraded waterways as a representation of how the world at large does not value them. There's also a great body of research that shows the link between degraded environmental conditions and the increase in the school prison pipeline.
349	David Scatena	I am concerned about water quality.
349	David Scatena	I also want to voice my concern about the algae blooms. They already occur, and construction will undoubtedly increase the frequency and magnitude which is destructive to the Delta.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: • water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that will not be flushed due to lack of freshwater in the Delta;
371	Mariah Looney Restore the Delta	Where are the real studies on additional exports on water quality for the Delta, and the urban Delta, of course?

382	Russel van Loben Sels	Page 2, bullet 3 states that the purpose of this project…I would encourage you to include the North Water Delta Agency contract. It specifically states the obligations of the State with regards to water, quality, quantity, and how it is moved through the North Delta. It specifically states that you shall not increase the level or decrease the level of the water in the channels in the northern Delta. This project will result in changes in those levels and changes in water quality.
391	Meg Giberson	Concerned about impacts to water quality
410	Roger Thibault	The Delta/Bay needs more water to stay healthy as nature designed them to be flushed out every winter to ensure the food cycle continues. This tunnel will only take fresh water and pipe it around the Delta (peripheral canal) while San Joaquin valley's big AG producers will ship back selenium and chemical laced water which will sit in the Delta because of lack of flow and lead to toxic algae and other unhealthy conditions.
417	Barbara Daly	Taking more water will destroy the largest estuary on the West Coast of the Americas. Harmful Algae Blooms are already overtaking the waterways and sloughs, and the state's answer to this is to spray more Round-Up on them. The World Health Organization found that Round-Up causes cancer. That means our state agencies are spraying cancer causing chemicals into our drinking water supply that's going to Southern California. Taking more water will cause more tendency towards these types of invasive species. Disposing of millions of tons of polluted tunnel muck that is mixed with chemicals and putting it anywhere in this Delta estuary is not acceptable for the people or the animals.
434	Tom Slater	The North Delta Water Agency and RD 999 also 10 expressed our concerns with the modeling numbers used in 11 the previous EIR. The 1981 contract sets year round 12 quality standards of Three Miles Slough just upstream 13 from Edmonton, which DWR failed to include in the 14 modeling for that EIR. 15 When the '81 contract water quality criteria 16 were applied against modeling results used in that 17 California WaterFix EIR analysis, a significant and 18 measurable increase in contract exceedances were 19 noticed. 20 The EIR also needs to address the thousands of 21 individual diversion intakes, primarily agriculture 22 siphons, located in the North Delta and consider 23 mitigation for impact to surface water elevations and 24 water quality where these diversions are located.
473	Luda Miller	I propose that the EIR actually investigate these lands that created this selenium runoff, which is part of the reason why we're having to ship this water south, is to dilute the pollution being created by an EIR that obviously was not done on that land and does not -- never showed that that land should be fallow and should have never been farmed.
480	Ken Robison Golden State Salmon Association	The Golden State Salmon Association is against this proposal as it currently stands. The Federal Clean Water Act requires the State Water Board to assess the Bay Delta water quality every three years. The State Water Board has not done their required work for 12 years. Any reasonable person would want to have a water quality baseline before making any decisions about diverting water, and that is the position of the Golden State Salmon Association. The federally required directive to assess the Bay Delta water quality is an absolute prerequisite. For a concept relativity, you're talking about 6,000 cfs or 7,500 cfs. Right now approximately 5,500 cfs is going down the river. You're proposing to divert an entire river.

484	Raven Stevens We Advocate through Environmental Review (WATER)	There needs to be a swim way put in place around Shasta Dam and no Shasta Dam raise. How will we redirect -- how will we redirect the fresh water flow in the proposed tunnel, and it affects the water quality in the Delta and surrounding areas? The EIR must analyze the ability -- I mean, it must analyze the impacts to salinity, pesticide levels, toxic hotspots, mercury and the ability of all wildlife to survive more changes.
488	Frank Toriello We Advocate through Environmental Review (WATER)	Operations of the new Delta Conveyance Project would increase the Department of Water Resource's ability to capture water during high flow events, the same as with the proposed Sites Reservoir Project. Along with increased impoundment behind the raise Shasta Dam, these diversions would result in a great decrease in water quality resulting in increase in salinity, toxic hotspots, pesticides, mercury and other pollutant discharge that won't be cleaned out due to a lack of seasonal high fresh water flows in the Delta with resulting detrimental impacts on the aquatic life in the San Francisco Bay and Delta. Already there's a severe drop in the numbers of returning Sacramento River Chinook Salmon.
497	Byron Nelson, Jr. Hoopa Valley Tribe	Recognize the influence that management of TRD carryover has on the ability to meet water quality standards in the Trinity River.
502	Jamie Bolt	We have not just a need for more drinking water, but we also have a huge growth in our waste water plant. So this is something I wanted to talk about, the environment issues with the Delta. This is already a situation. There's at least four major growing hubs that treat their waste water. The secondary waste water then gets flushed into the Delta. If we do not make sure that that flushy flow reaches the Bay, therefore out to the ocean, we have now contaminated our own water. We use the water, the Delta water, in order to flush this house. That's part of the system. To allow Southern California to take the first sip of fresh water flows leaves us now with further contamination, further risk of contamination from waste water, nitrates and ammonia, and not to mention just the salt water intrusion from the reverse flows.
510	Dominic DeBellis	How is this project now going to help the water quality that these people are going to have to deal with when you keep bringing in all of these people with the development, and then you're going to take water from here and put it someplace else?
510	Dominic DeBellis	Will this project worsen salinity in the Sacramento River?
516	Linda Hall	Do a study on what water quality will be like for communities like Discovery Bay, Bethel Island, and others around the Delta that depend on groundwater, well water. How will that be affected by salt water intrusion?
517	Dan Liveley	Salt intrusion in the Delta is caused by overallocation. It’s worse in drought years and made worse by sea level rise. If you do this project, you are going to wind up partitioning the Delta. If you choose the Eastern conveyance alignment you’re going to leave all of the levees, all the construction in place you’ve partitioned in the Delta
518	Mariah Looney Restore the Delta	The tunnel will make the green algae worse, preventing folks from recreating in waterways.

530	Kevin Romick Mayor, City of Oakley	The Delta depends on freshwater flows from the Sacramento River. Without, negative impacts include salinity intrusion, which will impact western Delta farms.
530	Kevin Romick Mayor, City of Oakley	Increased growth of harmful algae blooms will foster the spread of invasive aquatic species.
536	Jerry Willis	Selenium has been as high as Isleton. Isleton is not that far from Walnut Grove. As soon as there is selenium in the valley, we won't be able to grow anything.
537	Patricia Ziobro	There will be adverse impacts to residents, to sports enthusiasts, to Delta businesses due to the toxins that will come in the waters, damage to salmon runs and others species with reverse flows, and the impact on the drinking water supplies of many communities.

551	J. Mark Myles County of San Joaquin	San Joaquin County is particularly concerned about reductions in freshwater flows into the Delta that the Project would cause. The project would undoubtedly exacerbate harmful algal blooms formation, and this must be addressed in the Draft EIR. The scientific understanding of HABs has continued to evolve since the SWRCB hearings and the prior review of the twin tunnels projects, and those advances must be incorporated into the Draft EIR. Experts are conducting new studies that better identify the factors driving HABs proliferation. For instance, a new study examined how wet years impacted the persistence of Microcystis in the Delta. This study confirmed that "retention time in the upper estuary and water temperature were key environmental correlates with Microcystic bloom amplitude .The study's highlighting of flow rate and temperature as critical factors to HABs proliferation contradicts DWR's previous claims in the CWF FEIR/S and SWRCB hearings. Moreover, this new study is consistent with the evidence put on by Protestants at the SWRCB hearings ~ that increased temperature and water residency caused by CWF would increase the incidence of HABs formation.^ Moreover, the study's finding that high-flow wet years do not have the presumed flushing out effect on HABs in the Delta refutes assumptions made by DWR's experts at the SWRCB Hearings that minimal velocity increases "quickly disrupt" HABs.'® Another recent study conducted linked global climate change to increased HABs formation.^ In fact, "[freshwater HABs caused by toxic cyanobacteria... provide some of the clearest examples of HABs promoted by climate change and anthropomorphic forcing Another study reviewed HABs modeling in the context of climate change to evaluate current methodologies.''^ According to Ralston and Moore, climate change will increase HABs formation and proliferation due to warming temperatures, increased stratification, altered nutrient availability and composition, light intensity and ocean acidity." DWR must consider the rapidly and drastically changing climate when analyzing how the Project would further exacerbate HABs formation and proliferation. DWR cannot, as it did previously, simply assume that HABs formation is a product of climate change and excuse itself from analyzing the Project's incremental effects on the identified impact. (See California Building Industry Assn. v. Bay Area Air Quality Management Dist. (2015) 62 Ca!.4th 369. 388 ["In fact. CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present.''].)These new studies, and the laws in DWR's prior conceptual approach, underpin the necessity of a Delta-specific quantitative model to evaluate the Project's HABs impacts. San Joaquin County requests that DWR fully evaluate the Project's impacts, including those on HABs formation. to ensure full disclosure and require all feasible mitigation for the Project's numerous potentially significant impacts.
552	Nicole Suard Snug Harbor Resorts	In order to protect the drinking water quality and environmental and recreation assets of the Delta, San Francisco Bay area and Sacramento River Watershed areas, accurate and consistent water accountant data must be compiled and available to everyone impacted by DWR decisions and diversions.

552	Nicole Suard Snug Harbor Resorts	As reported by California's Waterboard, many areas of the Delta have hydro geologically vulnerable drinking water aquifers. https://www.waterboards.ca.gov/water_issues/programs/gama/docs/hva_map_table.pdf Screen print specific to the Delta area: https://www.snugharbor.net/images-2019/delta/wellimpacts/hydraulicallyvulnerable2019-ryer.jpgThis means that actions to or on the surface water, and drilling into Delta soils connected to the drinking water aquifers, could destroy the water quality or substantially degrade the drinking water aquifer. People living in the Delta, public drinking water systems all around the Delta, and cities and towns located in or around the Delta all rely on the drinking water aquifer. During the Waterfix hearings, DWR/SWC ignored the existence of the drinking water wells, public drinking water systems, towns and cities that could be negatively impacted by the continued excessive diversion of flows from the Delta and Sacramento River watershed. It amounts to a government taking of property rights if DWR continues to promote actions that negatively impact the drinking water aquifer of the Delta. Impact assessment must include verifiable data assumptions upon modeling is based, realistic mitigations and funding source for those mitigations along with clearly stated process for access to real time mitigation action. Per #3 above, adequate number of surface and groundwater monitoring stations throughout the Delta and Sacramento River watershed must be installed and operational for several years to create baseline data prior to commencement of any physical construction work impacting soils or groundwater in the Delta. Specific water quality constituents that must be addressed in any new conveyance proposal are increases in salinity, arsenic, mercury, nitrates and nitrites, pesticides, and toxins. As natural fresh water flow decreases through the Delta, the water quality is degraded through lack of normal dilution, or degraded by soils disturbances such as boring of soils samples along the North Delta waterways for past studies
560	Bradford Pappalardo Steamboat Resort	There are seepage and salinity issues and the effects on pumping for Delta farmers and agriculture users. Modeling should be performed and independently evaluated to determine the impacts of sea-level rise throughout the Delta to determine if placement of the intakes in the North Delta is the only option to get fresh water. Studies exist that show with climate change, the amount of outflow from wetter storm events will outweigh any impacts to salinity in the Delta from sea-level rise.

561	Diane Riddle State Water Resources Control Board	The EIR should include comprehensive water quality analyses to estimate potential impacts to beneficial uses that may occur as a result of the Project and identify specific mitigation measures to reduce, mitigate, or avoid adverse impacts to water quality and beneficial uses. The water quality analysis should evaluate the potential for the Project to cause or contribute to potential significant environmental impacts related to salinity, submerged and floating aquatic vegetation, harmful algal blooms, mercury, nutrients, dissolved oxygen, dissolved organic carbon, turbidity, temperature, and other water quality constituents. The environmental analysis should assess the effects of any changes in water residence time and flows within Delta waterways, in the Stockton Deep Water Ship Channel, and south Delta channels in particular. Mitigation measures should be proposed for adverse impacts to water quality conditions including dissolved oxygen, frequency and severity of harmful algal blooms, and excessive aquatic weed growth. The EIR should evaluate the effects of water quality changes, such as increases in salinity, on the multiple beneficial uses that are protected through water quality objectives. For example, salinity should be evaluated with respect to the potential for significant environmental impacts to municipal and industrial uses, agricultural uses, and ecological habitat for pelagic fish species, and specific operational constraints and mitigation measures should be identified to avoid significant impacts. Portions of the Delta within the project area are currently on the Clean Water Act Section 303(d) List of Impaired Waters for not meeting water quality standards due to chlordane, chlorpyrifos, DDT (dichlorodiphenyltrichloroethane), diazinon, dieldrin, electrical conductivity, Group A pesticides, invasive species, mercury, PCBs (polychlorinated biphenyls), and toxicity. The EIR should reference the most current 303(d) list and requirements contained in existing TMDLs for the Sacramento-San Joaquin Delta within the EIR, discuss any potential short-or long-term effects of these pollutants from project activities, and discuss mitigation measures, including monitoring and best management practices, to reduce potential impacts. If the Project has the potential to affect mercury or methylmercury concentrations in the Delta, acceptable mitigation options could include actions to reduce mercury entering the Project area.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	12200. Legislative findings and declaration The Legislature hereby finds that the water problems of the Sacramento-San Joaquin Delta are unique within the State; the Sacramento and San Joaquin Rivers join at the Sacramento-San Joaquin Delta to discharge their fresh water flows into Suisun, San Pablo and San Francisco bays and thence into the Pacific Ocean; the merging of fresh water with saline bay waters and drainage waters and the withdrawal of fresh water for beneficial uses creates an acute problem of salinity intrusion into the vast network of channels and sloughs of the Delta; the State Water Resources Development system has as one of its objectives the transfer of water from water-surplus areas in the Sacramento Valley and the north coastal area to water-deficient areas to the south and west of the Sacramento-San Joaquin Delta via the Delta; water surplus to the needs of the areas in which it originates is gathered in the Delta and thereby provides a common source of fresh water supply for water-deficient areas. It is, therefore, hereby declared that a general law cannot be made applicable to said Delta and that the enactment of this law is necessary for the protection, conservation, development, control and use of the waters in the Delta for the public good. (Added by Stats. 1959, c. 1766, p. 4247, 1.) 12201. Necessity of maintenance of water supply The Legislature finds that the maintenance of an adequate water supply in the Delta sufficient to maintain and expand agriculture, industry, urban, and recreational development in the Delta area as set forth in Section 12220, Chapter 2, of this part, and to provide a common source of fresh water for export to areas of water deficiency is necessary to the peace, health, safety and welfare of the people of the State, except that delivery of such water shall be subject to the provisions of Section 10505 and Sections 11460 to 11463, inclusive, of this code.(Added by Stats. 1959, c. 1766, p 4247, 1.) 12202. Salinity control and adequate water supply; substitute water supply; Delivery Among the functions to be provided by the State Water Resources Development System, in coordination with the activities of the United States in providing salinity control for the Delta through operation of the Federal Central Valley Project, shall be the provision of salinity control and an adequate water supply for the users of water in the Sacramento-San Joaquin Delta. If it is determined to be in the public interest to provide a substitute water supply to the users in said Delta in lieu of that which would be provided as a result of salinity control no added financial burden shall be placed upon said Delta water users solely by virtue of such substitution. Delivery of said substitute water supply shall be subject to the provisions of Section 10505 and Sections 11460 to 11463, inclusive, of this code. (Added by Stats. 1959, c. 1766, p 4247, 1.) 12203. Diversion of waters from channels of delta It is hereby declared to be the policy of the State that no person, corporation or public or private agency or the State or the United States should divert water from the channels of the Sacramento-San Joaquin Delta to which the users within said Delta are entitled. (Added by Stats. 1959, c. 1766, p 4249, 1.) 12204. Exportation of water from delta In determining the availability of water for export from the Sacramento-San Joaquin Delta no water shall be exported which is necessary to meet the requirements of Sections 12202 and 12203 of this chapter. (Added by Stats. 1959, c. 1766, p 4249, 1.) 12205. Storage of water; integration of operation and management of release of water. It is the policy of the State that the operation and management of releases from storage into the Sacramento-San Joaquin Delta of water for use outside the area in which such water originates shall be integrated to the maximum extent possible in order to permit the fulfillment of the objectives of this part. (Added by Stats. 1959, c. 1766, p 4249 [It must be emphasized

	that Section 12205 immediately above would preclude certain operations of any isolated facility since the releases for export intended to pass through the isolated facility would not help fulfill the objectives of the Act.] Water Code 11460 provides: 11460. Prior right to watershed water In the construction and operation by the department of any project under the provisions of this part a watershed or area wherein water originates, or an area immediately adjacent thereto which can conveniently be supplied with water therefrom, shall not be deprived by the department directly or indirectly of the prior right to all of the water reasonably required to adequately supply the beneficial needs of the watershed, area, or any of the inhabitants or property owners therein. (Added by Stats. 1943, c. 370, p.1896. Amended by Stats. 1957, c. 1932, p. 3410, 296.)@ The December 1960 DWR Bulletin 76 (Exhibit) which includes a contemporaneous interpretation by DWR of Water code Section 12200 through 12205 provides at page 12: "In 1959 the State Legislature directed that water shall not be diverted from the Delta for use elsewhere unless adequate supplies for the Delta are first provided. (Emphasis added.) Similarly the DWR confirmed its interpretation of law in the contract between the State of California Department of Water Resources and the North Delta Water Agency For the Assurance of a Dependable Water Supply of Suitable Quality dated January 28, 1981, which provides: "(d) The construction and operation of the CVP and S.P. at times have changed and will further change the regimen of rivers tributary to the Sacramento-San Joaquin Delta (Delta)and the regimen of the Delta channels from unregulated flow to regulated flow. This regulation at times improves the quality of water in the Delta and at times diminishes the quality from that which would exist in the absence of the CVP and S.P. The regulation at times also alters the elevation of water in some Delta channels."" (f) The general welfare, as well as the rights and requirements of the water users in the Delta, require that there be maintained in the Delta an adequate supply of good quality water for agricultural, municipal and industrial uses." "(g) The law of the State of California requires protection of the areas within which water originates and the watersheds in which water is developed. The Delta is such an area and within such a watershed. Part 4.5 of Division 6 of the California Water Code affords a first priority to provision of salinity control and maintenance of an adequate water supply in the Delta for reasonable and beneficial uses of water and relegates to lesser priority all exports of water from the Delta to other areas for any purpose." (Emphasis added.) (See Exhibit.)

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	In SWRCB D-1485 at page 9 the SWRCB provided: "The Delta Protection Act accords first priority to satisfaction of vested rights and public interest needs for water in the Delta and relegated to lesser priority all exports of water from the Delta to other areas for any purpose." The export projects must additionally fully mitigate their respective impacts and meet the affirmative obligations to the Delta and other areas of origin including those related to flow. Failure to so do results in a shift of the cost of the project to someone else. The State Water Resources Development Bond Act was intended to preclude such a shift in costs. See also Goodman v. Riverside (1993) 140 Cal.App.3d 900 at 906 for the requirement that the costs of the entire project be paid by the contractors. Water Code Section 11912 requires that the costs necessary for the preservation of fish and wildlife be charged to the contractors. The term “preservation" appears to be broader than mitigation and appears to create an affirmative obligation beyond mitigation. Title 34 of Public Law 102-575 referred to as the Central Valley Project Improvement Act in Section 3406(b) (1) authorizes and directs the Secretary of Interior to enact and implement a program which makes all reasonable efforts to ensure by the year 2002 natural production of anadromous fish (including salmon, steelhead, striped bass, sturgeon and American shad) will be sustainable on a long term basis at levels not less than twice the average levels attained during the period of 1967-1991
568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	The Delta Reform Act of 2009 includes provisions intended to provide additional protection for the Delta. Such provisions include Water Code §85054 which provides:" §85054. Coequal goals Coequal goals means the two goals of providing a more reliable water supply for California and protecting restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place." Water Code §85021 provides: "§85021. Reduction of reliance on Delta for future water supply needs The policy of the State of California is to reduce reliance on the Delta in meeting California's future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency. Each region that depends on water from the Delta watershed shall improve its regional self-reliance for water through investment in water use efficiency, water recycling, advanced water technologies, local and regional water supply projects, and improved regional coordination of local and regional water supply efforts." The Delta and other areas of origin both upstream and downstream are part of California and also need a more reliable water supply. The proposed project is clearly directed only at the ability of the S.P. and CVP to export water from the Delta. Restoration and protection of Delta water quality and flows including flushing flows are part of a more reliable water supply for California. Non-degradation of water quality and the statutory obligations to provide enhancement of water quality and an adequate supply are also absent from the proposal.

568	Dean Ruiz Central Delta Water Agency/South Delta Water Agency	THE CEQA ANALYSIS SHOULD INCLUDE AN EXAMINATION OF SILTATIONTRENDS IN THE DELTA.As referenced above, recent channel surveys and other anecdotal evidence indicate that in the southern Delta channel capacities are decreasing. Large areas of the San Joaquin River, Middle River, Old River, Doughty Cut and Salmon Slough have lost significant channel capacity due to siltation. After each of the most recent high flows years, degradation of channel capacity has increased. This appears to be a trend such that rather than the high flow year's flows flushing siltation farther downstream or out to the Bay, siltation now increases every year. Estimating the degree of degradation will allow needed modeling to predict how internal Delta flows may be affected and thus how the proposed project might exacerbate any problems.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	The DEIR should consider effects on Water Quality in the Delta: The DEIR must consider potentially significant effects of CVP and SWP operations in light of climate change on water quality in the Delta, including: a. The effects of reduced turbidity, changes in residence times, changes in flows, and other operational changes on the magnitude, duration, and frequency of harmful algal blooms; The effects of operations on salinity, residence time, and water temperatures in the Delta, particularly in light of sea level rise and climate change.
571	Karen Jacques	The EIR should analyze impacts of the tunnel on water quality, including increased salinity, toxic hot spots, pesticide, mercury and other pollutant discharge that won't be cleared out due to lack of adequate fresh water passing through the Delta. Also analyze the potential for increased algae blooms which are already a problem in parts of the Delta.
572	Katja Irvin	The largest impacts in these resource areas are related to flows. Please analyze how reduced flows will impact water quality, salinity, and endangered species (especially fish), not only in the Delta but also in the San Francisco Bay Estuary.
572	Katja Irvin	Please evaluate the impact on the water quality of water exported from the delta. Analyze how any changes in water quality will impact reservoirs south of the Delta that hold exported water, such as San Luis Reservoir, and Calero Reservoir (in Santa Clara County). Specifically, analyze how this will impact the frequency and severity of harmful algal blooms in these reservoirs
573	Jennifer Olguin	Moreover, the environmental disruption to the region will be irreversible as even just the construction and operation of the tunnel will "degrade the water quality for Delta farms, subsistence anglers, providers of urban drinking water (including Stockton, Antioch, and other cities), residents playing and swimming in Delta channels, and an increase in deadly toxic algal blooms" (Restore the Delta, Impact Report).
574	Philip Merlo San Joaquin Historical Society & Museum	How do the DWR and DCA plan to consider the environmental impacts of the construction process on water quality in the Delta? Specifically, how might increased barge flow, construction and drilling in water ways, and potential industrial runoff in waterways from construction, result in the import of invasive species into Delta water ways, cause turbidity disturbances during drilling, or lead to chemical waste drainage in delta water?

598	Bill Emlen Solano County	Furthermore, the Suisun Marsh (Marsh) which is comprised of diked seasonal wetlands, is the largest brackish water marsh in the Western United States. The Marsh is managed primarily as habitat for fish and wildlife. The Marsh salinity levels are mandated by the State Water Resources Control Board Water Rights Decisions and maintained by Delta outflow, tidal flows, and the operations of the Suisun Marsh Salinity Control Gates. Alterations to the quality and quantity of fresh water flows due to the Project's operations could result in reduced freshwater inflow to the Suisun Marsh and increased salinity, compromising existing water quality standards, wetland and habitat management, and Marsh management infrastructure which must be analyzed in the Project ElR.
610	Henry Kuechler Reclamation District No. 2060	Operations plans developed for the project must identify, avoid, and/or sufficiently mitigate for potential water quality impacts from salinity intrusion in seepage areas due to reverse flows or alterations to existing flow patterns, and resulting crop damage to residential wells agricultural users in high-seepage areas.
612	Warren Bogle Reclamation District 150	Operations plans developed for the project must identify, avoid, and/or sufficiently mitigate for potential water quality impacts from salinity intrusion in seepage areas due to reverse flows or alterations to existing flow patterns, and resulting crop damage to residential wells agricultural users in high-seepage areas.
614	William Busath City of Sacramento	Quantitative Approach: The EIR must evaluate water quality impacts in a detailed, quantitative manner for the duration of the Project. Such evaluation includes potential impacts from: (i) construction and mitigation projects such as those involving wetlands and riparian habitat; and(ii) reduction in Sacramento River and Delta outflows resulting in increased concentrations of all constituents of concern (including methylmercury) particularly given various water users such as the City have discharge permits, thus making it so that the public, regulatory agencies issuing those permits, and the permittees are adequately informed. Furthermore, failure to consider these detailed quantitative impacts will result in an EIR that will fall far short of adequately addressing water quality impacts and protection from a drinking water perspective. Using quantitative methods, wherever possible, will help to address the drinking water protection needed to mitigate source water treatment impacts at locations on the American River and the Sacramento River, especially in light of the increase in harmful algal blooms (HABs) in recent years.
614	William Busath City of Sacramento	Operational Detail: Modification to Delta hydraulics resulting from the Project would have a profound effect on Delta and exported water quality. The project proponents must develop tools to perform an adequate evaluation of these hydraulic impacts. Development of these tools is reasonable and necessary for adequate evaluation of potential impacts required for CEQA compliance, and potentially NEPA compliance. Without an evaluation of potential operating scenarios, the process would fail to sufficiently identify benchmarks, indicators, and remedial actions necessary to address impacts to water quality. [The attachment provided with this letter was also submitted separately and is listed in these tables under Letter 710.]

615	Justin Fredrickson California Farm Bureau	North Delta water quality assurances and salinity, water rights and water level management issues in support of current and historic levels of irrigated agriculture in the South and Central Delta are, indeed, important considerations, and issues that should be fully addressed in the EIR.
619	Bob Panzer	Address algae and water quality issues in the Delta.
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Buena Vista Rancheria of Me-Wuk Indians recommends DWR develop and apply hydrodynamic models to various pumping rates at various flow rates to study how chemical constituents, such as dissolved oxygen, temperature, salinity, and heavy metals (selenium, mercury) are affected by the varying river flows and pumping rates (including a no pumping option) that may occur as a result of this project.
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Buena Vista Rancheria of Me-Wuk Indians suggests conducting a thorough analysis of the impacts pumping from the Sacramento River will have on water quality and habitat of the delta ecosystem.
638	Carol Moon Goldberg League of Women Voters of CA	We do not see that high water quality standards will be protected in the Delta and the estuary, or that strong, binding environmental safeguards will protect all in-stream uses. Of growing concern are the health impacts, especially on low- or fixed-income water users, of Harmful Algal Blooms (HABs) caused by inadequate flows of freshwater through the Delta and the estuary.
662	John McManus Golden Gate Salmon Association	The DEIR should consider effects on Water Quality in the Delta: The DEIR must consider potentially significant effects of CVP and SWP operations in light of climate change on water quality in the Delta, including: a. The effects of reduced turbidity, changes in residence times, changes in flows, and other operational changes on the magnitude, duration, and frequency of harmful algal blooms; The effects of operations on salinity, residence time, and water temperatures in the Delta, particularly in light of sea level rise and climate change.
675	Terrie Mitchell Sacramento Regional County Sanitation District	The NOP provides no information on proposed Delta Conveyance Project operations, but does state that diversions could range from 3,000 cfs up to 7,500 cfs. The location and operation of the Project intakes presents the potential for significant adverse impacts to Regional San's operations and facilities from reverse flow events in the Sacramento River, as well as significant water quality impacts in the Sacramento River and Sacramento-San Joaquin River Delta. Based on the information presented in the NOP, the proposed Delta Conveyance Project appears to be very similar to the discontinued California WaterFix project, with the exception that it may have one less intake and somewhat reduced diversion capacity.

675	Terrie Mitchell Sacramento Regional County Sanitation District	The EIR Must Evaluate and Mitigate Impacts From Increased Frequency and Duration of Sacramento River Reverse Flow Events: In comments on the WaterFix EIR/EIS and draft Supplemental EIR/EIS and in testimony submitted in the WaterFix water rights change petition proceeding, Regional San raised concerns about the potential for the WaterFix project to adversely affect operations of the SRWTP through changes in water quality and the frequency and duration of reverse flow events. Due to the similarity of the Delta Conveyance Project to WaterFix, Regional San's specific concerns and evidence regarding the potential impacts of WaterFix on SRWTP operations are also applicable to the Delta Conveyance Project and must be addressed in the EIR using appropriate methodology, assumptions and analysis. These concerns include changes in water quality and the number and duration of low-flow and reverse flow periods in the Sacramento River.
675	Terrie Mitchell Sacramento Regional County Sanitation District	In evaluating impacts to Regional San's operations and facilities, the EIR must employ the appropriate methodology. DWR's evaluation of the WaterFix effects on SRWTP effluent diversions to emergency storage basins was incorrectly based on treatment plant inflows. An accurate assessment of the frequency and duration of Regional San's effluent diversion must properly account for discharges of effluent. Effluent flows are the flows regulated by the 14:1 river-to-effluent requirement, not inflows. Any simulations based only on inflows would not provide meaningful, relevant information, because they would fail to account for the discharge of treated effluent previously diverted to ESBs. Further, the14:1 river flow threshold at which effluent must be diverted to ESBs is continuously changing since SRWTP flow rates continuously change –both seasonally and over the course of a day. Therefore, SRWTP diversions (and impacts to diversions) must be simulated on a continuous, hour-by-hour basis using hourly flow rates in the Sacramento River at Freeport and hourly SRWTP operations up to the maximum authorized discharge rate of 181 mgd.
684	Jeff McCormack John McCormack Co.	Pollution of upstream water sources as the result of spoils tailing piles, called RTMs, ("Recycled Tunneling Materials") should be characterized according to their geologic origins, including potential radon, radioactive soil, that might have been pushed down out of the Sierras and lying latent, hidden 100-200 feet down. Stacking in piles will expose the piles to potential rainfall runoff, getting into water supplies, where it could be up taken by plants and grasses, into animal feed.
684	Jeff McCormack John McCormack Co.	There also could be reduced drinking water quality as the result of fuel spillage into surface waters, and sinking into the water table, flowing through soils into wells. The interplay of surface water and groundwater should be examined, and the impacts of SGMA and prioritization of over-allocation of water rights, as to socioeconomic impacts on farms.
698	Steve Lambert Butte County Board of Supervisors	The decision to eliminate the Sacramento Valley from hydrologic modeling in the BDCP/WaterFix demonstrated the disregard of the region and created an inconsistency within the EIS/EIR. The sensitivity of groundwater basins in the region necessitates that the DCP fully disclose and assess groundwater impacts upstream of the Delta.

698	Steve Lambert Butte County Board of Supervisors	The DCP must fully disclose, assess, and mitigate the impact of plans to incorporate north of Delta groundwater basins into the state water project.
702	Frank Toriello We Advocate Through Environmental Review	These diversions would result in a great decrease in water quality in the Delta, resulting in increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to a lack of seasonal high freshwater flows through the Delta; with resulting detrimental impacts on the aquatic life in the Delta and San Francisco Bay.
705	Roger Mammon	What will happen to the water quality in the Delta if the water is diverted through a tunnel beneath the Delta?
705	Roger Mammon	How will harmful algae blooms, now prevalent, be controlled?
705	Roger Mammon	What safeguards are in place to protect to protect the water quality that 4 million Delta residents depend on.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Salinity and Water Quality. Inflows are required to balance the water quality of the Delta. Salinity is a great concern for the Delta agricultural economy that encompasses over 500,000 acres of prime agricultural land. Already, salinity issues have not regularly met compliance by DWR on the 1981 North Delta Water Agency contract. In addition, during years of drought, DWR has violated the salinity standards numerous times and not been held accountable. Salinity in the South Delta regularly has levels that are over the required standards of acceptability, even in normal years. Current operations of the CVP and SWP have been exporting as much as half a million tons of Bay salt per year down to the westside service area, and as much as several hundred thousand tons a year of this non-indigenous salt has drained back into the San Joaquin River system and into the South Delta. Once there, the export operations further exacerbate the salinity in the channels by reducing circulation and creating stagnant zones where salinity levels spike uncontrollably. Over time this has also adversely impacted soil salinity and groundwater quality, damage which is difficult to reverse. A study found that the 1976 economic loss in the South Delta was over $7 million. The SWRCB later established salinity standards in the South Delta that still did not restore pre-Project levels. Instead of enforcing these standards, the SWRCB has now relaxed the standards, ignoring testimony and a 2016 study by Dr. Leinfelder-Miles of the U.C. Cooperative Extension in order to justify the change. This is a huge loss not just economically for the family and community, but also a loss for the wildlife. The Delta agricultural fields provide invaluable food and habitat resources for many species including waterfowl, coyotes, birds of prey, owls, frogs, insects, rabbits, river otters, and more. We request the EIR to address mitigations for improving the salinity issues throughout all the Delta.

711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	In addition, the tunnel is not a securely enclosed tunnel and water leakage is expected. Taking untreated river water and putting it underground near the clean domestic water table will eventually contaminate the underground water basin that most of the Delta residents depend on for their daily domestic water needs including drinking. If this project isn't going to improve the water quality in the Delta, it cannot move forward.
715	Daniel Wilson Reclamation District 3	Operations plans developed for the project must identify, avoid, and/or sufficiently mitigate for potential water quality impacts from salinity intrusion in seepage areas due to reverse flows or alterations to existing flow patterns, and resulting crop damage to residential wells agricultural users in high-seepage areas.
718	David Strecker San Joaquin Farm Bureau Federation	Salinity and Water Quality. Inflows are required to balance the water quality of the Delta. Salinity is a great concern for the Delta agricultural economy that encompasses over 500,000 acres of prime agricultural land. Already, salinity issues have not regularly met compliance by DWR on the 1981 North Delta Water Agency contract. In addition, during years of drought, DWR has violated the salinity standards numerous times and not been held accountable. Salinity in the South Delta regularly has levels that are over the required standards of acceptability, even in normal years. Current operations of the CVP and SWP have been exporting as much as half a million tons of Bay salt per year down to the westside service area, and as much as several hundred thousand tons a year of this non-indigenous salt has drained back into the San Joaquin River system and into the South Delta. Once there, the export operations further exacerbate the salinity in the channels by reducing circulation and creating stagnant zones where salinity levels spike uncontrollably. Over time this has also adversely impacted soil salinity and groundwater quality, damage which is difficult to reverse. A study found that the 1976 economic loss in the South Delta was over $7 million. The SWRCB later established salinity standards in the South Delta that still did not restore pre-Project levels. Instead of enforcing these standards, the SWRCB has now relaxed the standards, ignoring testimony and a 2016 study by Dr. Leinfelder-Miles of the U.C. Cooperative Extension in order to justify the change. This is a huge loss not just economically for the family and community, but also a loss for the wildlife. The Delta agricultural fields provide invaluable food and habitat resources for many species including waterfowl, coyotes, birds of prey, owls, frogs, insects, rabbits, river otters, and more. We request the EIR to address mitigations for improving the salinity issues throughout all the Delta.
718	David Strecker San Joaquin Farm Bureau Federation	In addition, the tunnel is not a securely enclosed tunnel and water leakage is expected. Taking untreated river water and putting it underground near the clean domestic water table will eventually contaminate the underground water basin that most of the Delta residents depend on for their daily domestic water needs including drinking. If this project isn't going to improve the water quality in the Delta, it cannot move forward.

724	Harvey Correia Reclamation District 2067	Operations plans developed for the project must identify, avoid, and/or sufficiently mitigate for potential water quality impacts from salinity intrusion in seepage areas due to reverse flows or alterations to existing flow patterns, and resulting crop damage to residential wells agricultural users in high-seepage areas.
729	Erik Vink Delta Protection Commission	If the project will adversely affect Delta water quality, as the BDCP/WaterFix EIR concluded, then vague pledges to provide alternative water supplies or offset increased local water treatment costs should be replaced with a mitigation program that spells out the processes used to identify mitigation actions, sources of alternative water supplies, action triggers, time frame, means of payment, fund sources, an objective third-party governance system, and other pertinent details. Delta water agencies should be involved as this mitigation program is developed.
730	Reclamation District 551	Operations plans developed for the project must identify, avoid, and/or sufficiently mitigate for potential water quality impacts from salinity intrusion in seepage areas due to reverse flows or alterations to existing flow patterns, and resulting crop damage to residential wells agricultural users in high-seepage areas.
730	Reclamation District 551	A related concern is that seepage from Delta Conveyance Project facilities may contaminate local water supplies, with domestic drinking wells being of singular concern. The water from the Delta channels is less pure than the water drawn from drinking water wells within the District, and could not be consumed without treatment. If seepage from the proposed facilities commingles in any significant amount with the local water supply, it could contaminate wells. If that happens, the Delta Conveyance Project would need to build a water treatment and delivery system for all affected residences, at no additional cost or inconvenience to the landowners.
730	Reclamation District 551	Construction of certain proposed facilities will also involve drilling up to 190 feet below the river, which could release mercury, again posing serious potential environmental effects on the local water supply that will need to be mitigated.
740	Ryan Hernandez Contra Costa County Water Agency	a. The EIR should analyze A full range of the water quality impacts and Delta Operations and Bay & Delta Water Quality with focus on: Presenting modeling data and disclosure of environmental impacts in a form that is usable and useful for decision makers and the public Using the full historical period, 1922-2019, in the analysis of the water quality impacts from the proposed project Mitigating any significant water quality impacts of the proposed project including the potential buildup of contaminants in south and central Delta.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The danger to public health posed by worsening harmful algal blooms in the Delta and other adverse water quality impacts exacerbated by the proposed project must be disclosed and assessed.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (G) The potential effects of each Delta conveyance alternative on Delta water quality.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	There are numerous other issues that must be addressed in the Draft EIR. Examples of such issues include adverse water quality and air quality impacts on Delta residents including environmental justice communities.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor Issue Summary: Muck ponds on Delta islands threatens in-Delta water quality.
747	Jan McCleery Save the California Delta Alliance	Eastern Corridor Issue Summary: Muck ponds on Delta islands threatens in-Delta water quality.

752	Amber McDowell Double M Farms	Water Quality. Flows are required to balance the water quality of the Delta. Salinity is a great concern for the Delta agricultural economy. The Delta has over 500,000 acres of prime agricultural land. The salinity issues already have not been regularly met compliance by DWR on the 1981 North Delta Water Agency contract. Salinity has crept farther up the Delta and once it contaminates the interior land of the island, that land is no longer productive. This is a huge loss, not just economically for the family farm and community, but also a loss for the wildlife. The Delta agricultural fields provide invaluable food and habitat resources for many species including waterfowl, coyotes, birds of prey, owls, frogs, insects, jackrabbits, river otters, and more. I request the EIR to address mitigations for preventing the inflow of salinity farther into the Delta.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effects, "Water Quality: changes to water quality constituents and/or concentrations from operation of facilities." The BDCP and WaterFix EIR/S failed to conduct scientifically defensible best available science analysis of impacts to water quality including dissolved oxygen and salinity. Construction dewatering discharge water quality affects must also be evaluated, especially with respect to point discharge water quality requirements.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR must also explain how DWR will in fact ensure that it will at all times maintain adequate Delta water quality in the wake of sea level rise, especially in critically dry years, and during foreseeable drought scenarios.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR must thoroughly explain precisely how it plans to implement this abandonment of the maintenance of adequate Delta water quality. For example: i. How many levees must simultaneously or otherwise fail before DWR will decide to abandon maintaining that water quality and start using the tunnel to export water needed to maintain that water quality? A single levee failure surrounding the tiniest of Delta islands? A single levee failure surrounding a "large" Delta island? Five such failures? Fifteen? ii. If the determination of what triggers DWR's abandonment of maintaining adequate Delta water quality is not based on the number of levee failures or the size of the Delta islands that are flooded, but instead, is based on the degree of salinity intrusion that results from such failures, then how degraded must the salinity get within the Delta, and where in the Delta will that degradation be measured, before DWR decides to abandon maintaining that water quality and start using the tunnel to export water needed to maintain that water quality? iii. How much water does DWR plan to export from the Delta through the tunnel while the Delta is suffering from degraded water quality as a result of levee failures? As much as DWR can physically export through the tunnel? A bare minimum "health and safety" amount? If the latter, how much does that entail and how will that amount be determined? iv. What mitigation measures, if any, will DWR implement to mitigate the exacerbation of degraded water quality in the Delta from its export of freshwater in the tunnel that is needed to restore that quality? Levee breach repairs, salinity berms, salinity barriers, salinity gates, etc.? v. What water quality will DWR try to maintain in the immediate vicinity of its north Delta intakes under all reasonably foreseeable levee failure scenarios? vi. To what extent will DWR honor its water quality commitments in its "Contract Between the State of California Department of Water Resources and the North Delta Water Agency for the Assurance of a Dependable Water Supply of Suitable Quality," dated January 28, 1981, in all reasonably foreseeable levee failure scenarios? vii. The EIR must also thoroughly explain when DWR will decide to resume maintaining adequate Delta water quality after it abandons that maintenance in the wake of one or more levee failures. What criteria will DWR use to make that determination? And how aggressively and quickly will it try to restore that water quality? How much of its available storage water will it be willing to use to restore that water quality versus exporting that water through the tunnel? What criteria will DWR use to make that determination? viii. The EIR must conduct a thorough and detailed analysis of the water quality that will result throughout the Delta under all reasonably foreseeable levee failure scenarios after DWR abandons the maintenance of adequate Delta water quality, and conduct a thorough and detailed analysis of the entire range of potentially significant adverse impacts to all aspects of the environment, public health, other water users (including the CVP export contractors if they do not participate in the use of the tunnel), etc. from that abandonment. ix. Because such abandonment will have devastating and widespread impacts on economic activities in the Delta, a thorough and detailed economic analysis must be prepared to assess the economic impacts as well as the secondary environmental impacts that may foreseeably result from such impacts. x. All in all, the EIR must provide a thorough and detailed analysis of the entire and expansive range of direct and indirect impacts that may foreseeably result from the abandonment of maintaining Delta water quality at every stage of that abandonment, from its inception through all reasonably foreseeable levee failure scenarios, and a thorough and detailed analysis of potentially feasible alternatives and mitigation measures to avoid

		or minimize such impacts for all of those scenarios. xi. Importantly, the potential environmental impacts from this planned abandonment of maintaining adequate Delta water quality must also be thoroughly compared and contrasted with alternatives, including the no project and other no-tunnel alternatives, that comply with all applicable laws and policies and, accordingly, do not involve DWR's abandonment of such maintenance.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR Must Thoroughly Discuss and Analyze the Environmental and Economic Impacts Resulting from DWR's Efforts to Offset the Project's Impacts on the SWRCB's D-1641 Standards, Including Term 91 Impacts. Even though it is clear that DWR, at a minimum, does not intend to comply with the SWRCB's D-1641 Delta Water Quality Standards in the wake of sea level rise and levee failures, the upcoming EIR will undoubtedly nevertheless make the unwarranted assumption that DWR will comply with those standards when it operates the project, and that compliance with those standards will reduce the project's individual and cumulative negative impacts on Delta water quality and flow. The act of complying with those standards, however, can foreseeably result in its own expansive set of substantial adverse impacts. to the extent the project, individually or cumulatively, triggers the need for DWR and USBR to release storage water to maintain one or more of D-1641's salinity or other standards, a vast number of diverters within the Delta watershed, including the Delta itself, must cease diverting under their post-1914 permits or licenses. Such cessation of diversions has the potential to cause substantial and widespread impacts on numerous environmental resources including terrestrial species, air quality, groundwater recharge, etc., as well as substantial adverse economic impacts and the secondary environmental impacts resulting therefrom. Accordingly, to the extent the EIR will rely on DWR's (theoretical) compliance with the various D-1641 standards to mitigate the impacts from the project's individual or cumulative impacts Delta water quality or flow, the EIR must first thoroughly analyze the extent, and under what hydrological and other conditions, the project will foreseeably cause DWR and USBR to the release storage water to bring those standards into compliance and, hence, trigger Term 91 curtailments. The EIR must then thoroughly analyze the entire host of potential direct and indirect environmental impacts resulting from those curtailments. Furthermore, because any DWR or USBR storage releases to offset the impacts of the project on the D-1641's standards will result in a redirection of that storage water from where that storage water would have otherwise been used in the absence of the project, the EIR must also thoroughly analyze the full range of potential direct and indirect environmental impacts from such redirection. For example, such impacts could foreseeably include impacts to cold water pool storage, carryover storage, river flows, water quality, water availability for senior water right holders, etc.

759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR Must Thoroughly Discuss and Analyze the Environmental and Economic Impacts Resulting from DWR's Use of the Tunnel During Governor Declared Droughts or Other Emergencies. the EIR must thoroughly discuss and analyze how DWR intends to operate the project during a Governor declared drought or other emergency where DWR's duty to comply with one or more of D-1641 or other water quality or flow standards is relaxed in some fashion. Without the project, DWR must allow Sacramento River freshwater to flow through the Delta and thereby freshen the water quality in the Delta before DWR can export it through its southern Delta intakes. With a tunnel, DWR can simply divert that freshwater directly into the tunnel and thereby deprive the Delta of the benefits of that water. If DWR uses the tunnel during such emergencies, then Delta water quality and flow will be directly degraded as a result of the redirection of available freshwater flows into the tunnel rather than allowing that water to flow through the Delta to improve Delta water quality and flow. The EIR must therefore thoroughly discuss and analyze, and compare and contrast, how Delta water quality and flow, and all of its natural values and resources that depend on that quality and flow, will fare during reasonably foreseeable Governor declared droughts or other emergencies with and without the project. The EIR must also thoroughly discuss and ultimately adopt feasible mitigation measures to avoid or reduce any such degradation of Delta water quality and flow as a result of the project. A reasonable range of alternatives to using the tunnel in these emergency conditions must also be discussed and analyzed.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Drought Operations: Rather than comply with D-1641 standards in drought conditions, DWR's historical pattern and practice is to seek near immediate relief from the SWRCB from compliance with those standards at essentially the outset of such conditions. Rather than reduce exports to preserve water to meet those standards to the maximum extent possible during drought conditions, DWR historically opts to seek waivers of those standards. As discussed above with DWR's proposed use of the tunnel in those conditions, adverse impacts to Delta water quality and flow will substantially increase. The EIR must thoroughly discuss and analyze this historical pattern and practice and explain how, with the proposed project, DWR is going to change its ways and set forth the detailed plan, including especially carryover storage requirements, that will ensure DWR cuts back exports as much as necessary to at all times maintain adequate Delta water quality and other flow requirements during all foreseeable drought scenarios.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	there are countless measures that could be taken in lieu of a tunnel to substantially reduce the risk of water quality degradation as a result of levee failures, including the following: – substantially strengthen the levees throughout the Delta; – prepare in advance for the prompt repair of any levee breaches; – prepare in advance to temporarily blend saltier Delta water with other water sources south of the Delta to temporarily dilute that saltier water to useable levels; – construct one or more south of the Delta treatment plants to dilute a portion of the saltier Delta water to usable levels; – maintain additional water supply reserves south of the Delta on standby, including groundwater reserves, to address temporary Delta water quality degradation while levees are being repaired and Delta water quality is being restored; etc.

767	Kelly Taber City of Stockton	Prior Delta conveyance planning efforts for the Bay-Delta Conservation Plan and California WaterFix prioritized water supply quality and reliability for south of Delta exporters over Delta communities, including Stockton. As a result, the State and south of Delta project proponents ignored evidence of the significant impacts to the City's water supply that would have resulted from the twin tunnels, which would have increased public health risks to Stockton's citizens from toxic harmful algal blooms (HABs) and rendered the City's surface water supply unusable for up to two months a year. Diverting a significant amount of Sacramento River water from the north Delta will make the City's surface water supply more saline, exacerbating climate-related effects. It also has the potential to modify Delta hydrodynamics, making Delta waters warmer and more stagnant, increasing the risk of HABs. Depending on the timing and volume of a north Delta diversion, the Project may lead to need for increased surface water treatment, and compromise Stockton's ability to recycle water or recharge groundwater. The EIR must adequately identify, analyze, and avoid or mitigate the Project's potential impact on the City's San Joaquin River water supply diverted at the DWSP. In evaluating impacts to Stockton, the EIR must employ the appropriate methodology and account for the unique circumstances of the City's diversion location and treatment plant capabilities. In developing the modeling and EIR analysis of these issues, DWR should carefully consider the expert evidence submitted by Stockton in the WaterFix water rights change petition hearing before the State Water Resources Control Board (SWRCB). Specifically, Stockton refers DWR to the work by Dr. Susan Paulsen, which will inform DWR of the type of information, assumptions, and methodology necessary to properly evaluate these impacts. All of this information is available to DWR through June 30, 2020 on SWRCB website at https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/exhibits/stockton.html. As detailed in Dr. Paulsen's testimony and expert reports, in order to provide meaningful information about the Project's potential water quality impacts, DWR must evaluate water quality changes using data from a new monitoring station located nearer to the DWSP diversion works or other location more representative of the conditions at Stockton's intake, and present information about water quality changes on daily, weekly, and monthly timescales relevant to drinking water operators in the Delta. In Stockton's case, this means the EIR must calculate and present data about changes on a daily basis, which is the relevant timescale for the City's real time operation of the DWTP (not the long-term monthly average data and cumulative probability diagrams used in the WaterFix EIR). It also must properly evaluate and account for changes in residence time, including the tidal nature of flows in the Delta and at Stockton's intake along the Deepwater Ship Channel. With longer residence times, flushing of the Delta decreases. Certain water quality constituents, including chloride, electrical conductivity, bromide, and organic carbon, are present in high concentrations in sources within the Delta and can accumulate within the Delta over time. Thus, longer residence times correlate with higher concentrations of these constituents and result in higher potential for HABs and microcystis growth. Toxic algal blooms and cyanotoxins, such as microcystis, are a growing public health threat to Stockton residents that will be exacerbated by climate change and any new Delta conveyance that diverts water from the Sacramento River in the northern Delta. The operations plan for the Project must recognize this threat, and consider, account for, and avoid adverse impacts to Delta hydrodynamics, including residence

		time, velocity, and water temperature effects, so as not to increase the frequency or duration of cyanotoxins or HABs. Chloride impacts must be assessed in light of the number of days the Project would cause water quality at the DWSP intake to exceed the City's operational threshold of 110 milligrams per liter (mg/L) chloride. DWR must not rely solely on existing water quality objectives to assess impact significance; as was demonstrated in the Stockton's WaterFix testimony, significant impacts to the City's water supply will occur if the Project causes chloride levels at the DWSP intake to exceed the City's operational threshold of 110 mg/L. Avoidance or full mitigation of impacts to Stockton's water supply must occur even if the Project would not cause exceedance of current water quality objectives.
767	Kelley Taber City of Stockton	In planning and evaluating a new Delta conveyance, DWR must not assume that simply meeting existing regulatory requirements is sufficient to avoid harm to in-Delta municipal water users, including Stockton. In the WaterFix water rights change petition proceeding, DWR took the position that compliance with SWRCB Water Rights Decision 1641 (D-1641) would avoid adverse effects to Delta water users. Stockton presented expert testimony and evidence that demonstrated that D-1641 compliance was insufficient to avoid significant impacts to Stockton's water supply, due to substantial water quality degradation from increased chlorides, electrical conductivity, bromide, and cyanotoxins. The Project EIR must consider the potential for significant impacts from water quality degradation, even if it does not exceed D-1641 or other adopted thresholds.
768	Jack Pelley	The system was set up so there would be a flush from the seasonal water flow that no longer happens due to water diversion that has plagued our delta and crippled Stockton that really ramped up in the mid 90s. If the major water being diverted out of our waterways in the Central Valley continue at the rate it is know my city (Stockton) will die. If you continue to take even more not only will my city of Stockton die the whole ecosystem will be destroyed. Now more than ever in the mid of a global pandemic we should see how important clean water is natural water flows tides that actually flow not restricted from excessive pumping being done at will being allowed to destroy the delta and my city. I hope all that may it concern to ramp down the pumping to a level that we can all live and thrive with. Please do more research before attempting to build a pipeline that will do further damage to our delta and cripple my city.
776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	As recorded in the Delta over the past year, changing conditions in the Delta may result in toxic algae blooms which are harmful to ecosystem, and possibly human, health. The DEIR should address questions related to the potential of the project's operation to affect toxicity of algae blooms. While many of these impacts are localized, BCDC is concerned about their potential impacts to San Francisco Bay and Suisun Marsh. The DEIR should address how long toxins remain viable and their potential to reach San Francisco Bay. What are the concentrations of concern and do they degrade over time? Could removing more freshwater from the system exacerbate the quantity, size and toxicity of blooms? Will there be any alternatives or mitigation measures available to prevent migration of toxicity from blooms or extension of blooms into the Commission's jurisdiction?

791	Arabella Merlo	ln regards to Impacts and Mitigation: The argument was made by DWR staff at a Scoping Public Hearing that salt water intrusion is a foregone conclusion due to climate change. This is obviously to take the impact of salt water intrusion out of the discussion of impacts and mitigation. Salt water intrusion is a real issue now and not something the EIR can overlook due to the excuse that sea water levels may rise ln the future. Removing water from the Delta with this project does increase salt water intrusion and the impact to habitat and farming must be considered. The EIR must consider drought and high water events and their effects (algae blooms, air and Water quality) as well as how less water will be allocated.
796	Byron Nelson, Jr. Hoopa Valley Tribe	Recognize the influence that management of TRD carryover has on the ability to meet water quality standards in Trinity River End of season carryover storage behind Trinity Dam influences the ability to meet water temperature standards protective of salmon spawning below Lewiston Dam. Specifically, the total volume of cold water available on 1 June is of significance; this can vary substantially from year to year with volume of runoff, volume and temperature profile of carryover from previous years, and temperature of the present year's runoff into Trinity Lake. Limitations of TRD infrastructure also affect the ability to meet water temperature needs as the current facilities cannot be operated to avoid considerable heat gain during summer months. As described in a letter written on 23 May 2016 by the Chair of the Trinity River Restoration Program, Federico Barajas, in a letter to Reclamation Regional Director, David Muriillo. "During periods of drought, and in the future under virtually all climate warming scenarios, the 2-3°F increase in water temperature that occurs in Lewiston Reservoir will likely elevate temperatures to unsuitable levels for salmonids for which Reclamation has Tribal Trust, Public Trust, and Endangered Species Act (ESA) responsibilities." Water temperature standards for Trinity River below Lewiston Dam were exceeded in October 2015 for a period of two weeks during the onset of salmon spawning. On 21 January 2016, the Tribe filed a request for enforcement of Water Rights Order 90-52, which prohibits diversions from Trinity River that adversely affect salmonid spawning and incubation.
807	Lori LaFata	Please study for algae bloom, we must save our delta. Do not over pump!
809	Martin Freitas	the effects of this will increase salinization into the delta causing harm to wildlife, farming, and drinking water.

817	Thomas J. Slater RD 999	Although there may be relevant information from the past environmental planning process (for example, the significant volume of information submitted by Delta parties such as RD 999 and NDWA), there was an inordinate amount of inaccurate information that was not addressed satisfactorily by DWR. Most importantly was the way the EIR did not address the possibility of saltwater intrusion as a result of the new diversions being located near Clarksburg, Hood, and Courtland. These potential diversions are less than a mile away from RD 999. We have siphons and pumps diverting water from the Sacramento River, Elk Slough, and Sutter Slough, Minor Slough, and the Sacramento Deep Water Ship Channel. All our diversions would be greatly impacted from saltwater intrusion and the previous EIR did not adequately address this likely occurrence. It is important that accurate modeling be used to analyze data to determine the severity of saltwater intrusion. Saltwater intrusion has ramifications that would prohibit existing siphons and pumps from diverting clean water to our fields, as well as be devastating to fish populations and more damaging to the environment. Relocation of these pumps and siphons is not a realistic solution.
826	Melinda Terry North Delta Water Agency	In addition, the water quality of these agricultural and municipal water supplies must not be impaired by dewatering and discharge activities during Proposed Project construction or by the operation of three new proposed intakes on the Sacramento River.
826	Melinda Terry North Delta Water Agency	Avoid or mitigate impairment of the water quality of agricultural and municipal water supplies.
826	Melinda Terry North Delta Water Agency	Effects Analysis should include modeling of changes in salinity levels at all seven water quality monitoring stations identified in the 1981 Contract.
826	Melinda Terry North Delta Water Agency	Conduct cumulative effects analysis on water quality in the Cache Slough Complex from the operation of three 3,000 cfs intakes on the Sacramento River when combined with restoration of fish habitat in Cache Slough Complex, including the Yolo Bypass.
853	Susan Alexander	The EIR must analyze the tunnel's cumulative impacts, with particular focus on water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to lack of freshwater in the Delta.
885	Claudia Mackey Restore the Delta	Restore the Delta (RTD) advocates for local Delta stakeholders to ensure that they have a direct impact on water management decisions affecting the water quality and well-being of their communities, and water sustainability policies for all Californians. We work through public education and outreach so that all Californians recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration. We fight for a Delta whose waters are fishable, swimmable, drinkable, and farmable, supporting the health of the San Francisco Bay-Delta Estuary, and the ocean beyond. Our coalition envisions the Sacramento-San Joaquin Delta as a place where a vibrant local economy, tourism, recreation, farming, wildlife, and fisheries thrive as a result of resident efforts to protect our waterway commons.

926	Scott R Pope	This project will effect the Delta water heavily. By taking the fresh water before it enters the Delta this will cause a lot more invasive plants like Hyacinth & Blue Green Algae to invade the waterways. Discovery Bay will have to deal with the possibility of underground issues & very bad water. This will also impact Delta recreation with the closure of main arteries. There are better solutions for SoCal to help fix their water situation.
953	Jan McCleery	C) Resulting in-Delta water quality targets must be clarified. The analysis should include the water quality in the Discovery Bay waterways. Due to over-pumping during drought years and lowering quality in the San Joaquin River from Central Valley farms has resulted in an increase of invasive plants and toxic blue-green algae. Removing the fresh Sacramento River water before it can dilute the San Joaquin River water and can flow through our waterways needs clear targets and operational guidelines.
957	Martin Freitas	Fourth, the effects of this will increase salinization into the delta causing harm to wildlife, farming, and drinking water.

Table D-20. Comments Regarding Geology and Seismicity

Letter	Commenter Name, Affiliation	Comment Text
50	Michael Tognolini East Bay Municipal Utility District	Delta Levees and Mokelumne Aqueducts It is the established policy of EBMUD to (1) allow the use of District aqueduct rights-of-way by others only under the terms of a written agreement, (2) prohibit uses incompatible with EBMUD's property rights, operation and maintenance of the aqueducts and distribution pipelines, or that potentially impact EBMUD's assets, (3) ensure that all uses of aqueduct rights of-way accommodate future construction of replacement aqueducts, additional aqueducts, and potential improvements to the aqueducts, and (4) ensure construction from any proposed third party project that passes under, over, or through a fee-owned or easement established aqueduct right-of way is evaluated in detail for potential impacts, and mitigations are identified and implemented to the level of no significant impact. EBMUD staff evaluates each proposed use of EBMUD's aqueduct rights-of-way for conformance with this policy and may approve or disapprove proposed uses in their sole discretion. Proposed uses not in conformance with the above-described policy will not be approved. EBMUD's existing Mokelumne Aqueducts, crossing the Delta east to west (as shown in Attachment 1) intersect both tunnel corridor options, as illustrated in Figure 1 of the NOP. The Project threatens to expose the Mokelumne Aqueducts and their deep foundations to substantial adverse effects resulting from ground settlement, undermining, lateral earth movement, and construction vibrations. To assess these potential impacts, the EIR must analyze whether the construction or long-term operations of the Project, as designed, would: Interfere with the Mokelumne Aqueducts' deep foundations; Weaken or otherwise impact surrounding levees that protect the Mokelumne Aqueducts; And Reduce the structural stability of the aqueducts and levees through ground loss, tunnel seepage, or tunnel exfiltration. At a minimum, completion of these analyses will require preparation of geotechnical investigations in the vicinity of potential Project crossings of the Mokelumne Aqueducts ROW to characterize ground conditions within the potential ROW crossings, identify the potential need for ground improvement, and aid in the avoidance of geologic risks associated with the construction of the Project and long-term risks of seismic induced liquefaction and settlement. EBMUD should be consulted and should have the opportunity to review and comment on these geotechnical investigations. Any adverse impacts to the integrity of the aqueducts could cause significant environmental impacts and costs resulting from the potential suspension of water service that could occur if risks to EBMUD's facilities resulting from the Project are not appropriately mitigated. Thus, the EIR must explore mitigation measures such as designing the Project at an elevation to avoid direct interference with pile tips of the Mokelumne Aqueducts and future aqueduct foundation repair projects to ensure the ongoing integrity of the Mokelumne Aqueducts. Additional mitigation measures that should be explored in the EIR include, but are not limited to:

50	Michael Tognolini East Bay Municipal Utility District	Additional mitigation measures that should be explored in the EIR include, but are not limited to: Ground treatments to be completed prior to tunneling, such as jet grouting, permeation grouting, and potentially other methods to form a more stable ground mass not susceptible to ground movement; Implementation of monitoring to allow rapid detection of problems during construction within the Project's Mokelumne Aqueducts ROW crossing. At a minimum, this monitoring should include installation, data collection and maintenance of surface settlement points and instrumentation, that includes, but is not limited to extensometers, piezometers, and inclinometers. All EBMUD facilities in the vicinity of the ROW crossing should be monitored, as should groundwater levels, relevant levee elevations, and the ground surface within the Mokelumne Aqueducts ROW; Long-term monitoring of groundwater levels and ground settlement, and completion by the Project of any corrective actions necessary to protect the integrity of EBMUD facilities in the Mokelumne Aqueducts ROW that are impacted by the Project; Compensation of EB MUD for any damage to EB MUD facilities resulting from the Project, and for any loss of EBMUD water supply caused by the Project; • Coordination with EBMUD regarding Project design activities related to the Project's Mokelumne Aqueducts ROW crossing that occur after EIR certification; Installation of a two-pass system with secondary watertight tunnel liner to control groundwater seepage and tunnel exfiltration in the vicinity of the Project's Mokelumne Aqueducts ROW crossing; and EBMUD review, comment, and approval of construction submittals and schedules for work within the Project's Mokelumne Aqueducts ROW crossing.
50	Michael Tognolini East Bay Municipal Utility District	Additional mitigation measures that should be explored in the EIR include, but are not limited to: EBMUD review, comment, and approval of construction submittals and schedules for work within the Project's Mokelumne Aqueducts ROW crossing.

50	Michael Tognolini East Bay Municipal Utility District	EBMUD previously provided comments (Attachment 3) on DWR's Soil Investigation for Data Collection in the Delta- a data gathering effort associated with the Project. Attachment 3 provides a comprehensive discussion femur's concerns with respect to the Mokelumne Aqueducts and EBMUD's ROW. EBMUD is moving forward this year with additional planning and engineering work necessary to complete preliminary design for its Delta Tunnel, ultimately leading to completion of CEQA review for the project. In the absence of adequate mitigation to protect EBMUD's existing and future aqueduct and tunnel facilities, EBMUD will be unable to grant discretionary approval for the Project to cross through Mokelumne Aqueduct ROW in accordance with its established policy governing use of the ROW. For that reason, these issues must be addressed in the EIR and cannot be deferred for later consideration. [From Attachment 3] DWR's prior efforts to advance the BDCP/WaterFix did not adequately assess its Project's impacts on the Mokelumne Aqueducts. Chapter 13.1.5 of the BDCP Conceptual Engineering Report erroneously concluded that ''no conflicts are anticipated" with regard to the Mokelumne Aqueduct crossing, and Chapter 13.2.5 indicated that the crossings "will be evaluated at the preliminary design level in conjunction with EBMUD." Analysis of potentially significant environmental effects cannot be deferred to a future date. Such analysis must instead be completed during the earliest stages of planning and alternatives analysis. A potential DWR Delta conveyance tunnel threatens to expose the Mokelumne Aqueducts and their deep foundations to substantial adverse effects resulting from soil settlement/subsidence, undermining, lateral earth movement, construction vibrations and vibration induced settlement. In addition, a Delta conveyance tunnel would also pose a significant risk of indirect environmental impacts resulting from the potential suspension of water service that could occur if impacts on EBMUD's facilities are not appropriately mitigated. DWR must also address a likely conflict between its future Delta conveyance tunnel and EBMUD's future cross-Delta tunnel. EBMUD owns the land and subsurface rights along the alignment of the Mokelumne Aqueducts (the EBMUD ROW) and has begun planning for a cross-Delta twine! To replace its existing above-ground aqueducts. EBMUD's design for its cross-Delta tunnel places the EBMUD tunnel within an elevation range of -80 ft msl to -130 ft msl (NA VD88 vertical datum). Any Delta conveyance tunnel proposed by DWR must address this reasonably foreseeable conflict. EBMUD expects the DWR Delta Conveyance Project to avoid tunneling within this elevation range at the site of the DWR tunnel's intersection with the EBMUD ROW and to also provide an appropriate additional clearance between the two facilities. Finally, the Project will be taking place in the general vicinity of EBMUD's Mokelumne Aqueduct ROW which EBMUD holds in fee. Any projects being planned within or immediately adjacent to EBMUD property wil1 need to follow EBMUD's Procedure 718 - Raw Water Aqueduct Right-of-Way Non-Aqueduct Uses. A copy of the procedure is enclosed for your reference.
82	Joanne Vinton	I'll be looking for detailed information about faults that run through the site, how a tunnel would be built to withstand movement on a fault, how the weight of water in the new forebays might trigger earthquakes.

117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] The Project Purpose (under NEPA) detailed in Sections 2.4 is generally similar to the Projective Objectives described under CEQA, although earthquakes are not mentioned. The companion Project Need detailed in Section 2.5 is more propaganda than a true statement of need and must be rewritten in order to be consistent with both the facts and the project that is actually described in the Plan and the EIR/EIS. In Section 2.5.1, Delta Ecosystem Health and Productivity, actual data on the decline of native species could and should be cited rather than offering slanted speculation on the causes of these declines: Most of the original tidal wetlands and many miles of sloughs in the Delta were removed by channelization and levee construction between the 1850s and 1930s. These physical changes, coupled with higher water exports and declines in water quality from urban and agricultural discharges and changes in constituent dilution capacity from managed inflows and diversions, have stressed the natural system and led to a decline in ecological productivity. This language makes it sound as if higher water exports and urban and agricultural waste water are merely contributors to the current decline of the Delta ecosystem, rather than prime causes. While undoubtedly hydraulic mining, channelization of the rivers for flood control purposes and reclamation of the Delta irreversibly changed the River- Delta-Bay ecosystem, salmon runs measured in the millions persisted even after the first dams were built on the rivers. It was only when water exports started to be ratcheted up that salmon populations declined dramatically. Getting real about the causes of the problem might shine more light on possible solutions4. Section 2.5.2, Water Supply Reliability, concludes with the following statement: The current and projected future inability of the SWP and CVP to deliver water to meet the demands of certain south of Delta CVP and SWP water contractors is a very real concern. More specifically, there is an overall declining ability to meet defined water supply delivery volumes and water quality criteria to support water users' needs for human consumption, manufacturing uses, recreation, and crop irrigation. This heart-rending language should be replaced with an evaluation of how much water surplus to Northern California and environmental needs is actually available for export under various scenarios. It is acknowledged that there will never be complete agreement on how much water is needed for environmental purposes but it is relatively easy to make calculations of how much surplus water is available for export making a range of assumptions regarding Delta outflows and pumping locations and operating rules. Such basic calculations do not appear to have been done but they are necessary to see whether it is now feasible to approach full contract amounts for exports even with favorable hydrological conditions when the diversions from the Northern Rivers that were to supply as much as 5 maf per year when those contract amounts were agreed to are no longer available as a result of State and Federal policy changes.

117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] 3. All the material in the EIR/EIS regarding the threat posed to reliable water supply by earthquakes is a red herring and must be revised or deleted. The language of the Executive Summary and of Chapter 2 on Objectives and Purpose and Need, cite the "the potential for public health and safety impacts resulting from a major earthquake that causes breaching of Delta levees" as one of the reasons for needing the BDCP. However, the EIR/EIS includes no formal evaluation of the impacts of earthquakes on water supply and water quality and therefore does not show that the preferred alternative is any better than the no action alternative. In particular, Sections 2.5.2 on Water Supply Reliability and 2.5.3 on Delta Hydrology and Water Quality say nothing about earthquakes. Unless the implied threat to water supply and water quality can be justified by something more substantial than reliance on discredited and outdated studies such as the Delta Risk Management Strategy, and the impacts quantified in Sections 2.5.2 and 2.5.3, all the scattered references to the imagined threat to the Delta levee system posed by earthquakes should be deleted. These scattered references are detailed in Appendix B. To the extent that any discussion of this subject is retained, reference should be made to the Economic Sustainability Plan of the Delta Protection Commission which includes an updated appraisal of the vulnerability of the Delta levee system to earthquakes and an explanation of the flaws in the DRMS study. In summary, the current public draft of the EIR/EIS does not show any compelling evidence that earthquakes are a significant threat to water supply reliability or water quality nor does it reference the latest authoritative study on the vulnerability of the Delta levee system to earthquakes, namely the Economic Sustainability Plan of the Delta Protection Commission. These flaws must be corrected and then a new draft EIR/EIS must be released for public review and comment.

117	Robert Pyke	[Attachment 1: Comments on the BDPC Public Draft EIR/EIS] 4. Chapter 9 on Geology and Seismicity and Chapter 10 on Soils are not rational contributions to this EIR/EIS and the one real construction risk with consequences for the environment, namely loss of ground as a result of tunneling activities leading to levee failures, is ignored. Chapter 9, Geology and Seismicity, is misnamed. The geology and seismicity of the Delta region is what it is and will not be impacted by any of the considered alternatives or by doing nothing. The chapter is actually about the impacts on people and property of various natural hazards, including earthquakes, and how they might be affected by the considered alternatives relative to doing nothing. It would make more sense for Section 9.1, Affected Environment / Environmental Setting, along with Appendix 3E, to be combined and inserted as a an additional chapter early in the document as background to the subsequent evaluation of impacts in various categories of environmental impacts. Likewise, an intelligent and up-to-date discussion of the vulnerability of the Delta levee system should be inserted much earlier in the EIR/EIS as background to the subsequent evaluation of the impacts of the project. The remainder of Chapter 9 follows some cookbook formula and includes mention of hazards such as debris flows, tsunamis and seiches which have no relevance to the Delta. This material should be rewritten to focus on impacts to people and property resulting from natural hazards that are applicable in the Delta. The treatment of liquefaction in this chapter is not only outdated and incorrect but misplaced. Again, this is background material that should be covered earlier in the EIR/EIS. The subject of liquefaction of sands in earthquakes is relevant but the treatment of it in the EIR/EIS is overly conservative, as detailed in Appendix B. Nonetheless, the conclusion that the hazard to the BDCP conveyance facilities posed by any potential for liquefaction of sandy soils in earthquakes can be addressed in design or otherwise mitigated, is likely valid, just as it is for other elements of the built environment in the Delta including the levee system. The treatment of this subject needs to be rewritten to put the hazard in perspective. The hazard being low, it is possible to address it in design or otherwise mitigate it. However, the one real construction risk with consequences for the environment associated with construction of the proposed conveyance facilities (as opposed to cost and schedule), namely loss of ground8 as a result of tunneling activities leading to levee failures, is ignored. Only a minor loss of ground when tunneling passes under river and slough crossings could lead to breaching of levees, flooding of the adjacent islands and tracts, and even flooding of the tunnels themselves. Similarly, the soils in the Delta are what they are and will not be substantially impacted by any of the considered alternatives or by doing nothing. It is true that over time the surficial soils in the proposed “habitat areas” might become more organic rich, but that is secondary relative to the negative impact on agricultural-based economy of the Delta and the possible, but dubious, ecosystem benefits. In summary, the treatment of natural hazards in the current public draft of the EIR/EIS is poorly organized, is misleading as to the hazard due to liquefaction in earthquakes, and this draft omits critical discussion of the possible effects of loss of ground due to tunneling operations. That possibility should be addressed elsewhere along with other impacts on the people, property and environment of the Delta. These flaws must be corrected and then a new draft EIR/EIS must be released for public review and comment.

140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	Decision tree showing how water transfers would be handled if/when declines to fish populations or other ecosystem health indicators decline.
248	Tom Williams	Provide definitions and quantification of seismicity and risks for the Forebay, named water conveyance facilities, and pump stations.
248	Tom Williams	Provide maps of all measurable, recordable seismic events 0 - +7 RM within 50 miles of any proposed tunnel alignments and within 100 miles of any Project shaft. Provide map with correlations of events with most probable fault plane (including surface traces and subsurface projections). Provide map of any known or suspected “blind fault plane” within 25 miles of any alignment. Provide a map of all known breaches of levees within the Project region and 50 miles above and below planned physical facilities and a map of known areas of inundation. Provide a map and description of all levee reinforcements conducted and placed within the Project region from 1930-Date. Distinguish between earthen works and others (e.g., slurry/grout walls and treatments, cutoff walls, crown barriers, etc.). Provide impact assessment and mitigation for “Geology and Seismicity: changes in risk of settlement during Life of Project, during construction and operations”.
343	Margo Praus Sierra Club of California Member	And one of the stated purposes is to minimize the disruption of water delivery south of the Delta that might result from a major earthquake that might cause breaching of Delta levees and the inundation of brackish water into the area of the pumping plants. None of us wants to see our levees break. Will the EIR address any levee structures, what's needed to support them?
418	Sonia Diermayer	The analysis of tunnel alternatives should 15 address the many questions that were raised about WaterFix regarding the engineering and such as the ability of the tunnels to survive major earthquakes.
466	Joanne Lee California Indian Environmental Alliance	On page 16 of the portfolio it states, California's main system of water conveyance which moves a large portion of the state's surface water supply continues to be under threat from flood, subsid -- earthquake and climate change and that an earthquake can disable the current levy supported conveyance infrastructure in the Delta threatening the drinking water of over half of all Californians, however, on page 15 of the Delta Conveyance Design Infrastructure Authority, ICR Panel Memorandum, it states that there is no active fault crossings along the Delta Conveyance alignment and that the current seismic demands are not extreme compared to other projects, therefore, this proposed project is unnecessary because the current system is sufficient.

697	Delta Independent Science Board	Comments on WaterFix Final EIR/EIS to consider in Delta Conveyance EIR: Despite excellence in its Appendix 6A, the Final EIR/EIS still falls short in assessing impacts to Delta levees, and it has also become out of date on seismic threats to the levees. Appendix 6A does not assess levee impacts systematically across the broad range of BDCP alternatives, nor among the three California WaterFix alternatives. Absent as well is assessment of potential impacts of State priorities in levee investments. We did not notice any reference to the asset estimates included in the Delta Levees Investment Strategy (Ellis et al., 2016). Estimates of seismic risk in Appendices 6A and 3E, and in Chapter 9 ("Geology"), rely mainly on findings that are a decade or more old. Recent advances neglected include the UCERF3 estimates of California fault-rupture probabilities (Field et al., 2013), lowered estimates of average slip on the Southern Midland fault (Unruh et al., 2016), and revised estimates of Delta ground motions (Fletcher and Boatwright, 2013; Eberhart-Phillips et al., 2014; Baltay and Boatwright, 2015; Erdem et al., 2016; Eberhart-Phillips, 2016; Fletcher et al., 2016). The Final EIR/EIS provides, in chapter 29, an example of how further assessment of potential impacts to levees could have been presented (concerns 1 and 2). Section 29.3.2 systematically analyzes an aspect of climate-change impacts on the California WaterFix options 4A, 2D, and 5A, and on the No Action Alternative. Keeping the Final EIR/EIS current with respect to Delta seismology (concern 3) is more than a matter of citing incremental advances of purely academic interest. Evolving views of Delta seismic hazards are important because the EIR/EIS describes earthquake-induced failure of Delta levees as a justification for the proposed project (p. ES-1, 6A-1).

711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Earthquake impact. Researchers from the University of California and the Network for Earthquake Engineering have been testing model levees to understand how the unique peat soil of the Delta, as deep as 80 feet, may respond to an earthquake. Of all the levee failures in the past, none have been associated with an earthquake. The research teams have conducted tests on both dry peat soil and saturated peat soil. It showed that the levees held, especially when the testing machine broke instead of the levee while trying to test for higher magnitude earthquakes. The results showed that pore pressure ratios are not large enough to significantly degrade shear strength. There are techniques for quicker repair of levees from breaches. We request the EIR to show the mitigation costs of a levee breach from an earthquake so that we can compare this alternative to the proposed project that part of the rationale for building is to prevent levee failure from an earthquake. The cost and timeframe to fix a levee failure will be quite less than a damaged tunnel from the same earthquake 100-200 feet underground. There are several studies on the impact of earthquakes on tunnels. Locally in California, 2 separate earthquake impacts are documented in "Earthquakes and Seismic Faulting: Effects on Tunnels" by Villi A. Kontogianni & Stathis C. Stiros. The Wright Railway Tunnel in Santa Cruz was impacted by the 1906 San Francisco earthquake with offset of 1.5m and was closed for over one year due to collapse. We request the EIR to investigate the timeline and costs for mitigating if a mega-earthquake occurs, which will cause damage to the tunnel. We request the EIR to address the following recommended general issues for tunnel design identified in ScienceDirect's "Impact of Seismic Design on Tunnels in Rock" as the author noted often tunnels are unlined and limited in ground support to make the design more efficient in materials and time required to install them. Especially with this project not being placed in ideal solid rock, these factors for the success and longevity of the tunnel are extremely important to get right the first time during the design. construction of the tunnel. The EIR needs to address that the project is properly designed and built without shortcuts financially, safety, or of the necessary materials.

718	David Strecker San Joaquin Farm Bureau Federation	Earthquake impact. Researchers from the University of California and the Network for Earthquake Engineering have been testing model levees to understand how the unique peat soil of the Delta, as deep as 80 feet, may respond to an earthquake. Of all the levee failures in the past, none have been associated with an earthquake. The research teams have conducted tests on both dry peat soil and saturated peat soil. It showed that the levees held, especially when the testing machine broke instead of the levee while trying to test for higher magnitude earthquakes. The results showed that pore pressure ratios are not large enough to significantly degrade shear strength. There are techniques for quicker repair of levees from breaches. We request the EIR to show the mitigation costs of a levee breach from an earthquake so that we can compare this alternative to the proposed project that part of the rationale for building is to prevent levee failure from an earthquake. The cost and timeframe to fix a levee failure will be quite less than a damaged tunnel from the same earthquake 100-200 feet underground. There are several studies on the impact of earthquakes on tunnels. Locally in California, 2 separate earthquake impacts are documented in "Earthquakes and Seismic Faulting: Effects on Tunnels" by Villi A. Kontogianni & Stathis C. Stiros. The Wright Railway Tunnel in Santa Cruz was impacted by the 1906 San Francisco earthquake with offset of 1.5m and was closed for over one year due to collapse. We request the EIR to investigate the timeline and costs for mitigating if a mega-earthquake occurs, which will cause damage to the tunnel. We request the EIR to address the following recommended general issues for tunnel design identified in ScienceDirect's "Impact of Seismic Design on Tunnels in Rock" as the author noted often tunnels are unlined and limited in ground support to make the design more efficient in materials and time required to install them. Especially with this project not being placed in ideal solid rock, these factors for the success and longevity of the tunnel are extremely important to get right the first time during the design. construction of the tunnel. The EIR needs to address that the project is properly designed and built without shortcuts financially, safety, or of the necessary materials.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (F) The resilience and recovery of Delta conveyance alternatives in the event of catastrophic loss caused by earthquake or flood or other natural disaster.
747	Jan McCleery Save the California Delta Alliance	New tunneling concerns as the tunnel practically goes under Discovery Bay

752	Amber McDowell Double M Farms	Earthquake impact. Researchers from University of California and the Network for Earthquake Engineering have been testing model levees to understand how the unique peat soil of the Delta, as deep as 80 feet, may respond to an earthquake. The research teams conducted tests on both dry peat soil and saturated peat soil. It showed that the levees can hold, especially when the testing machine broke instead of the levee trying to test for higher magnitude earthquakes. The results showed that pore pressure ratios are not large enough to significantly degrade shear strength. There are techniques for quicker repair of levees from breaches. I request the EIR to show the mitigation costs of a levee breach from an earthquake so that we can compare this alternative to the proposed project that part of the rationale for building is to prevent levee failure from an earthquake. I think the cost and timeframe to fix a levee failure will be quite less than a damaged tunnel from the same earthquake 100-200 feet underground. There are several studies on the impact of earthquakes on tunnels. Locally in California, 2 separate earthquake impacts are documented in "Earthquakes and Seismic Faulting: Effects on Tunnels" by Villi A. Kontogianni & Stathis C. Stiros. The Wright Railway Tunnel in Santa Cruz was impacted by the 1906 San Francisco earthquake with offset of 1.5m and was closed for over one year for collapse. I request the EIR to look into the timeline and costs for mitigating if a mega-earthquake occurs which will damage the tunnel. I request the EIR to address the following recommended general issues for tunnel design identified in ScienceDirect's "Impact of Seismic Design on Tunnels in Rock" as the author noted often tunnels are unlined and limited in ground support to make the design more efficient in materials and time required to install them. Especially with this project not being placed in ideal solid rock, these factors for the success and longevity of the tunnel are extremely important to get right the first time during the design construction of the tunnel. The EIR needs to address that the project is properly designed and built without shortcuts financially, safety, or the necessary materials.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effects, "Geology and Seismicity: changes in risk of settlement during construction." The EIR must include impacts to collapse of aquifer structure from construction dewatering; risk to levee integrity from construction vibration, settlement and fracturing; risk to levee integrity from tunnel or intake structural failures, risk to levee integrity from failure of Forebay impoundment dams, etc.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	Earthquake Impacts to the Project's Facilities: In prior EIRs for the tunnels there was a gross lack of verification that any, much less all, of the project's expansive features (tunnels, embankments, forebays, shafts, etc.) will be adequately protected against earthquakes. DWR makes a giant issue about the earthquake risk in the Delta, yet all of the project's expansive facilities are proposed to be constructed within the heart of the Delta. The EIR must provide detailed information and analysis confirming that these facilities will somehow be immune to those risks.
788	Jill North	With the State vulnerable to seismic events in this particular area, how can this project even be considered?

Table D-21. Comments Regarding Soils

Letter	Commenter Name, Affiliation	Comment Text
248	Tom Williams	Provide technical, quantitative and numerical description of source materials, boring related changes, and discharge conditions, and probable treatments and conditions of the RTM ("reusable tunnel material") within 1, 10, and 30 days from discharge beyond the shaft. Provide technical, quantitative and numerical description of potential reuses for embankments Provide technical, quantitative and numerical description of other purposes. Provide technical, quantitative and numerical description of "stored purposes", especially including water contents and strengths.
249	Bryan Griess Transmission Agency of Northern California (TANC)	DCP design and construction activities potentially affecting soil engineering properties, drainage, and surface and subsurface hydrology and integrity could have the potential to significantly increase soil liquefaction, alter localized soil-water hydrologic conditions that reduce soil stability and consequently the integrity of transmission tower footings.
263	Chief Sisk Winnemem Wintu Tribe of the McCloud River	I would like to see the framework of your science that will be used for digging that far down in the Delta, and the effects of that.
264	Matt Conover Reclamation District 1002	We're concerned about the 1100 acre forebay that would be placed somewhere in that jade green area east of two of the three intakes, which have been – one of which, the northernmost, would go into Hood itself, Hood-Franklin Road crossing I-5, and impacts from a possible new overpass that would be built over I-5. And parallel roads, all roads for the muck that would be taken out of the additional forebay involving 150 truckloads a day of muck, where would that muck go, and where would that forebay drainage for gravity flow require tunneling soil samples? The tunnel could be down to 200 feet, but soil samples are being proposed for only 50 to 100 feet. So I'm wondering what good those are going to do if you don't know what's down below that. The impacts are going to start right away, proposed for spring 2020, which starts next month. Those vertical soil borings would require our ranch, which spans the width of that gold there and the reclamation district starting at the top of the gold of 6,000 acres of three or four different ranches and vineyards and orchards would have some pattern of drilling. We don't know yet, but orchards, a lot harder to deal with, take out of trees, then vines and a slower re-growth. Those are 100-year-old trees. So we need to find out where their soil samples bore sites are proposed to be and start appraisals on the value, so we can calculate the destruction costs and get fair compensation for those drill holes for the soil sampling, and get paid up front on that sort of impact. Those kinds of impacts are going to be felt all the way down the corridor, so I hope you're budgeting for that sort of thing.

598	Bill Emlen Solano County	Constructing the intakes, access shafts, tunnel bore, and accessory facilities will encompass large areas and generate massive amounts of debris, spent cuttings, and wastes. The NOP proposes to either reuse the material or store it near the launch shaft locations. It is possible that not all material and debris generated can be reused due to residual contaminants and/or soil characteristics. Debris, mud, and waste generated need to be assessed and analyzed before determining that it can be reused. Adequate sampling and analysis should be conducted on all material prior to considering reusable and should include evaluations based on the intended use of the material compared to background concentrations in the host site. Waste that is not deemed suitable for reuse must be properly disposed at an accepting facility. Storage of the material should also follow an assessment and management plan describing how the material will be managed to avoid environmental and water quality impacts. The EIR should also assess the impacts to managing and disposing of materials that are not adequate for reuse due to contamination and/or soil type. Alternatives should include reducing the Project size and capacity in order to reduce the amount of material and wastes generated and associated impacts.
747	Jan McCleery Save the California Delta Alliance	Other testimonies to the SWRCB included a tunneling expert opposing tunneling through the Delta due to soft alluvial soils. That expert testified that tunneling in soft soils has many issues, particularly under a train trestle and EBMUD water pipes. The ITR Committee experts agreed that the Central Corridor soils are not suitable for tunneling.
747	Jan McCleery Save the California Delta Alliance	In addition, the tunnel route now comes dangerously close to Discovery Bay homes. As commented above, a tunneling expert's witness testimony during the SWRCB Permit Hearings raised many issues that could occur tunneling through soft, alluvial soil.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effects, "Soils: changes in topsoil associated with construction of the water conveyance facilities." The EIR must also assess impacts of ongoing and incremental salt accumulation in soils on productivity and land use suitability from continued operation and increased water deliveries from the SWP, impacts from the storage, drying and transport of tunnel material - please see previous related comments.
759	Dante J. Nomellini, Jr. Central Delta Water Agency	The EIR Must Thoroughly Discuss and Analyze all Environmental and Geological Investigations Necessary to Design and Construct the Project and all Environmental Impacts Resulting Therefrom. Extensive environmental and geological investigations have taken place over the last decade in furtherance of a tunnel project. While DWR has unlawfully piecemealed the CEQA review of those investigations, the upcoming EIR must include a thorough discussion and analysis of the full nature and extent of all of the reasonably foreseeable environmental and geological investigations (borings, CPT tests, etc.) that DWR will likely pursue in order to design and construct the project's numerous and expansive facilities. A disclosure and analysis of the locations where such investigations will take place, a detailed description of the nature and extent of such investigations, and a thorough analysis of the potential environmental impacts from all aspects of such investigations must be included in the EIR. The EIR must also include a thorough discussion and analysis of mitigation measures and alternatives to avoid or reduce those impacts.

Table D-22. Comments Regarding Fish and Aquatic Resources

Letter	Commenter Name, Affiliation	Comment Text
10	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	…the specific and cumulative effects of three more deleterious challenges to Delta ecosystem's survivability: a> The problems, disruption, damage, and pollution to the Delta -- especially, its aquatic connectivity and viability, inclusive of the dependent species -- from years of the various negative impacts along with their long term residual effects, caused by the construction and prep phase of the project.
48	Libby Lucas	Request you also address these specific areas of concern: - diversion conveyance impacts on anadromous fishery both as to 'take' in fish screens, and disruption of migration attraction flows
48	Libby Lucas	Request you also address these specific areas of concern: - loss of natural riparian channel habitat due to head cutting erosion from in-channel cement structures of diversion conveyance
48	Libby Lucas	Request you also address these specific areas of concern: loss of riparian corridor vegetation impacts on water temperature with increase in invasive species of fish, wildlife and plants

50	Michael Tognolini East Bay Municipal Utility District	Analysis of Impacts to Eastside Tributary Fisheries - including the Mokelumne Fishery EBMUD is concerned that the Project-related changes in flow and water quality will reverse the beneficial impacts of its JSA-related work to boost Mokelumne salmonid populations. The Project elements, including a change in diversion point from the south of Delta to the north of Delta region, will lead to significant changes in flow and transport through the Delta, both quantitatively and qualitatively. Changes in Delta Cross Channel (DCC) operations will also impact flow patterns. These changes in flow patterns may impact adult salmon escapement and straying. Changes in Delta outflow patterns, including changes in Old and Middle River (OMR) flows, especially in the April-June timeframe could impact juvenile salmonid outmigration characteristics, causing outmigrating juveniles to spend more time in the central and southern Delta where their likelihood of survival decreases. The Mokelumne-specific data on this phenomenon is limited, and DWR should complete additional studies to fully inform the Project EIR and subsequent operations. DWR should complete a long-term monitoring program designed to determine how migration of tagged Mokelumne River salmonids through the Delta is affected by operations of DWR's facilities under the existing conditions and under conditions expected as a result of the Project. DWR should also implement a trap-and-barge plan designed to determine whether a trap-and-barge program is a feasible means to improve survival rates and serve as a mitigating measure. At a minimum, specific fishery related parameters to identify and assess in the EIR include: Changes in Delta inflows and outflows; Changes in directional flows, especially with respect to directional flows to the south of delta pumping facilities; Changes in residence time of water in the Central and South Delta; Changes in water quality constituents, including salinity and temperature; and Changes in Delta Cross Channel operations. Not only must the EIR include an assessment of these parameters, but it must also analyze the extent to which Project-caused changes in the parameters will adversely impact the survival of Mokelumne-origin juvenile salmon, and whether those changes will increase straying of returning adult salmon. The Project EIR must fully analyze and disclose these potential effects. Adequate mitigation measures should be proposed, adopted, and implemented for any adverse impacts identified. Such mitigation measures could include: A DCC operational plan that keeps the gates closed for at least 15 days per month during the months of October and November to protect upmigrating Mokelumne-origin salmon from straying to other river systems, and coordinates those closures with Lower Mokelumne River pulse flows. An operational plan that reduces exports from the Jones and Banks Pumping Plants to maintain OMR flows between April 1 and May 31 that are protective of juvenile salmonid outmigration. These requests for analysis and potential mitigation measures are necessarily limited by the lack of specificity in the NOP. Additional analysis and consideration of additional mitigation measures may be warranted when the project and its operation plan become better defined.
61	Janice Gloe	A tunnel at the Delta will hurt the salmon! This is where they change back from salt water fish after having lived in the ocean for years to fresh water fish before their long journey back to their spawning grounds near Mt. Shasta!

121	Petition: Save Our Salmon	Less than a week after the release of the plan, the state opened the comment period for the new "Delta Conveyance Project" or Delta Tunnel (formally the Twin Tunnels) diversion proposal, showing that the Governor does not care what the people of California have to say about his portfolio. The one tunnel project is a proposal to build a massive new water diversion in the Northern Bay Delta near where the Sacramento River enters. This is where the Delta's water is the cleanest and it is an extremely important area to endangered and subsistence salmon and smelt species.
128	Nancy Kuykendall	Any actions taken should not be allowed to harm native fish at all because they are already on the edge of survival. The fish are the foundation of the ecosystem and I think this plan would harm them. Please protect resources and cultural rights in your decisions.
130	Barbara Mauk	I am a resident of Hyampom in Northern California. I write to state my utmost opposition to the Delta Conveyance Plan that would divert water from our rivers to places south. THIS IS AN OUTRAGE. We know that the watersheds here WILL BE impacted. Our rivers are already stressed due to the lack of normal amounts of precipitation, especially this year, as well as in years past.
131	Felice Pace	Analysis of Delta Conveyance impacts should include: Assessing potential impacts to the Trinity Hatchery related to water supply and water temperature impacts.
136	Mike Ackley	Will this do anything to our fish?
137	Ellen Koivisto	Take the water away from the north and ship it south and you destroy the life in the north that depends on that water. Since that life includes the salmon and other fish species that go to the ocean, collect resources there, bring these resources back to the rivers in northern CA and deposit them deep in the forests when they die, that means that you are not only condemning these fish species to extinction by taking away their water, but you are also condemning all the species that depend on them for this resource collection and redistribution.
137	Ellen Koivisto	What species depend on these fish? Bears, obviously, but also orcas, seals, and over 130 other animal species. But the forests themselves also depend on the salmon. Without the fish, without their infusion of fertilizer, without the massive amount of nitrogen they deposit when dying, the forest is failing. In the face of incredible stresses from a rapidly heating climate and invasive species (like the bark beetle), trees are weakening and dying. If you kill the salmon, you cripple the forest; they are tied together. So what? Who needs forests? We do. Our coastal forests create rain. Trees provide surface areas for droplet formation, and load the air with particles that provide rain nucleation sites. Redwoods survive by wringing water out of the air and dropping it to the forest floor where it nourishes life, forms into streams, joins up into rivers, and flows down to the Delta. Kill the forest and you do irreparable harm to the hydrologic cycle that northern California depends on.

138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. Anticipated climate change impacts include more rains and lesser snowpack in the mountains. This will reduce flows into and through the Delta. Temperatures in the rivers could significantly increase. Reduced and potentially warmer river flows will have a variety of negative impacts downstream. These would not only harm the endangered smelt species and the salmon but will impact the entire estuary into the San Francisco Bay. The wider impacts of salinity should be thoroughly discussed. The Delta is not an isolated piece of California located in the central valley; it is a vital part of the entire valley and bay area.
140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	The opposition is based on the project's potential to: Damage the ecosystem health of the Delta. o Delta smelt, salmonids and the salmon populations will be impacted first. o Increased salinity will be compounded when including climate change and sea level rise. o Conveyance tunnel may rupture during an earthquake causing catastrophic and irreversible damage to the Delta region.
145	Meredith Cooper	The EIR should analyze impacts to California's salmon people, including salmon dependent Tribes and coastal fishing communities.
151	Felice Pace	Yurok Tribe member Georgiana Gensaw said it best: " "We are not dumb ... we know what that tunnel is coming for. We are Indians. We know how things work. If there's a road, a highway is coming next ... we see things down the line," Genshaw said." The proposed Delta Conveyance serves the interests of Big Ag and, if built, will materially damages the interests of those who depend on salmon and healthy Rivers. The Taxpayers don't want to subsidize Big Ag any more.
157	Julie Fouquet	Additionally, extracting large amounts of water from the Delta is extremely hard on fish species such as salmon.
161	Dr. Steven White	It is also deeply troubling that "maintaining ecosystem viability" is not listed as a topic the EIR will consider. This should be discussed as follows. --In the Project Description explain how the concept of "functional flows" [18] will be utilized in designing the target annual hydrograph of freshwater flow into the Bay/Delta system, where functional flow is defined as a strategy for allocating water in order to support crucial processes upon which native aquatic species depend. Explain how closely this hydrograph model will follow the natural flow regime. Intimately tied to this is the requirement to discuss the lifecycle histories [8, 18] of important species in the ecosystem and incorporate that into the biological resources analysis, since these lifecycles have developed in species over time in direct response to the natural flow regime.

161	Dr. Steven White	--Secondly, a number of important metrics must be evaluated if environmental impacts to bay and delta estuaries (and the adjacent stretches of rivers that feed them) are to be understood. Some of these metrics have been alluded to above (turbidity, water temperature and salinity, for example), but since we in the "general populace" currently have been given no idea of what you will study or how, please consider this a formal request to evaluate the following important estuary metrics. --Metrics of the physical environment, including: (i) geomorphology (depth and height profiles for deposition and scour, modeling, predator hotspots etc.), (ii) flow velocities, (iii) sediment transport and budgets (both for the estuary and rivers feeding it), (iv) turbidity, (v) salinity/specific activity, and (vi) water temperature. --Metrics of the chemical environment, including: (i) dissolved oxygen, (ii) pH, (iii) mineral nutrients (types, amounts and distribution), (iv) presence of selected contaminants (amounts and distributions). --Metrics of the biotic environment, (which would probably fall under your "fish and aquatic resources" topic) including: (i) phytoplankton chlorophyll concentration and phytoplankton productivity, (ii) phytoplankton counts and biovolume, (iii) aquatic bacteria counts and growth rates and ideally a broad-scale microbial survey (as could be developed by high-throughput DNA sequencing), (iv) microzooplankton counts and species identities, (v) macrozooplankton abundance, biomass and identities, (vi) epibenthic crustacean abundance and biomass , (vii) survey of fish population identities, abundance and distributions, (viii) diets and growth rates of selected fish species, (ix) bivalve identities, abundances and biomass (esp. important for filtration estimates), (x) aquatic and shorebird identities and estimated abundances, (xi) aquatic vegetation extents, distributions and biomass, (xii) abundance of rare larger vertebrates (seals and otter, for example), and (xiii) presence of introduced and/or invasive species (percent by species, numbers or biomass) and their effects on native Bay and Delta populations [8, 2, 18 and references therein]. A long list of river metrics can be provided as well, but rather than supplying that long list here (it is similar but certainly not identical to the estuary metrics cited above, since it also includes considerations of velocity structures in the river channel, flow inundation mapping in areas where floodplain connectivity occurs, differences in the assemblage of indicator species in a river environment etc.) I refer you to the section on river metrics presented in the 2019 study entitled Developing Biological Goals for the Bay-Delta Plan: Concepts and Ideas from an Independent Scientific Advisory Panel by Drs. Dahm, Kimmer, Korman, Moyle, Ruggerone (lead author) and Simenstad [18].
161	Dr. Steven White	Another key consideration is the selection of delta indicator species used to estimate environmental impacts. --What are your indicator species and what is the scientific rationale for their selection (and the exclusion of others)?
161	Dr. Steven White	--Related to the question above is the idea of using multiple species as indicators for a specific habitat/environment [18]. A pelagic assemblage of indicator species, for example would exhibit a different species collection from that of an inshore, shallow-water assemblage vs a benthic channel assemblage vs an inshore vegetation assemblage. Again, please supply your scientific rationale for selection of different species in different habitats.

161	Dr. Steven White	These metrics and considerations are especially important for understanding the fate of key fisheries species such as Chinook salmon. The single tunnel "Delta Conveyance" project is currently proposed to extract (divert into the tunnel) 6,000 cubic feet of water per second (cfs) from the Sacramento River. Since there is a strong correlation between the extent of freshwater flow in the rivers feeding into the Delta and the abundance and survival of Chinook salmon [2, 8], please analyze the projected effect of this 6,000 cfs diversion of water on salmon survival, and discuss how will that effect be monitored, evaluated and mitigated.
167	Tracey Licerio	How will this project affect the extinction of Salmon runs?
171	William Roltsch	The current water plan advocates the removal of 5 to 7k cfs water. This is down from the twin tunnel plan of 9K. These amounts of redirected water need to be specifically stated and convey under what circumstances various amounts can be reasonably removed without jeopardizing fish and wildlife. For example, 7k cfs to be taken if necessary during years of very high precipitation and flow (but specifics need great detail) for water storage, etc.
177	Sunny Cosce	Salmon populations along these rivers have been in severe decline since the "fish kill" in 2002, when over 70,000 adult salmon perished along the Klamath due to low, warm water conditions. These conditions were and are preventable by ensuring an adequate flow of cool water. This occurs naturally when water is not diverted upstream. The people who live along these rivers have always depended on the salmon and other species for subsistence and sacred ceremonies. It is vital to our communities that we keep our fisheries from collapse and extinction! The impact of this tunnel project would be irreversibly devastating. I implore you to put a stop to the diversion of water from the Trinity River.
180	Martin Heatlie	Preservation of a healthy salmon population, and maintaining the delta marsh environment should take priority over delivering water to southern California. The tunnels should not be built if they will in any way adversely affect these vital resources. Conversely, the tunnels should only be built if it can be shown, with specific details, as to how they will benefit the salmon population and the delta marsh environment.
181	Liz Elias	According to Deidre des Jardins of California Water Research, and the Sierra Club water committee, our delta is at high risk if this project goes through. The Delta Smelt is already in decline, and as this is an indicator species, further withdrawals from this river system are ill-advised.
181	Liz Elias	Arguments are made about recharging groundwater. This cannot happen if surface water is redirected to other areas. This "conveyance" boondoggle will not serve the local area, or conserve water. N or will it protect endangered species: quite the opposite. Fish kill at intake sites will be drastic.
185	Susan Wallace	Comment raises concerns regarding potential impacts to fish and farming in the Delta. Commenter states that there is no need to take water form the delta to support desert farms that export most of their crops.
186	Phyllis Johnston	Comment raises concerns related to the Delta ecosystem as well as the livelihood of Delta farmers and fishermen.

204	Raven Stevens We Advocate through Environmental Review (WATER)	How will the salmon survive this Administration's new Biological Opinion? There needs to be a swim-way put in place around the Shasta Dam.
206	Steve Gordon	Has the protection of game fish predators been addressed, and how? From my time in the Bay, Delta, rivers and lakes, I observe countless cormorants, otter, numerous species of merganser, and other fish ducks, the non-native striped bass, and seals all looking for dinner. In Redding, the ducks above he ACFD diversion cruise downstream and fly up to repeat eating the smolt and fry that we are committed to protecting. Takes a lot of fish to feed a hungry bird
210	Anna Powell	Project will have adverse impact on fishery of Klamath and Trinity rivers, which will be a form of cultural genocide for Hupa, Yurok, and Karuk tribes.
213	Dania Rose Colegrove	Protect salmon and river health
214	Will Harling Mid Klamath Watershed Council	Analyze impacts of further water diversions on salmon-dependent people and ecosystems.
216	Jenny Staats	Analyze impacts to California salmon people: communities that are salmon-dependent, tribes, coastal fishing communities.
218	Gino O'Rourke	They depend on fish for subsistence, and culturally.
235	Tim Stroshane Restore the Delta	Operationally, the new DCP will depend for water on increased storage at Shasta Lake, the new Sites Reservoir, and elsewhere. It will also depend on increased imports from the Trinity River. Water from these sources will come from regions where Indigenous peoples reside and who themselves depend upon good quality water and sufficient fresh water flows for the health of Chinook salmon runs. These salmon runs are miraculous for the epic character of their life histories. They depend on healthy water ways from the Delta north to the Sacramento River, and from the Pacific Ocean to the Trinity and Klamath Rivers to complete them. Religions and spiritual lives of the region's Indigenous peoples are bound up with the survival and flourishing of salmon. Their environmental justice fight is for survival of their cultures and their communities. Salmon are at the center of their world and lives. If all Californians—including their powerful water agencies—valued the miracles that salmon perform year-in and year-out, we all (Indigenous and immigrant Californians alike) could enjoy this healthy food source. But they are devalued in favor of supplying water mainly benefiting farm export crops in the current warming climate.
248	Tom Williams	Provide detailed descriptions, PFDs/P&IDs, and links to equipment suppliers and certification authorities for fish screens and sources for designation of "state of the art" fish screens. Provide definitions for state-of-the-art and practical/reasonable/effective fish screens.

263	Chief Sisk Winnemem Wintu Tribe of the McCloud River	This affects the Delta smelt and also the salmon acclimation processes here.
271	Isaac Kinney	Any new diversions or points of diversions will mean that there will be less water in certain parts of the Trinity and Sacramento. And again, we know less water is more, higher water temperature, and with any of the fish, our brothers and sisters in the water, high water temperature, they can't breathe. They talk about a fish kill before. So I want to make sure that that's included.
292	Bruce Campbell	Use a baseline for the EIR that abides by good biological and hydrological science in terms of water flow for the ecosystems sourced into the Bay Delta and to protect threatened and endangered species.
292	Bruce Campbell	Evaluate each alternative in regards to how the entire Sacramento San Joaquin Delta food chain would be impacted if there was a major reduction in fresh water reaching the central Delta and San Pablo and San Francisco Bays, such as would occur under the tunnel alternative.
292	Bruce Campbell	Include in your analysis the impact on the whole food chain on Delta Smelt and Chinook Salmon.
313	Mike Lynes Audubon California	Audubon is also part of the Migratory Bird Conservation Partnership (MBCP) with Point Blue Conservation Science and the Nature Conservancy. On July 29, 2014, the MBCP provided a comment letter on the BDCP and set forth the following principles that we believe are relevant to the current proposed Project: •PRINCIPLE 1: Avoid Detrimental Impacts to Wetland Water Supply •PRINCIPLE 2: Mitigate for Impacts to Brackish and Freshwater Wetland-associated Birds and Bird Habitat. •PRINCIPLE 3: Use Adaptive Management to Improve Mitigation Outcomes.
313	Mike Lynes Audubon California	Specifically, we are most concerned about the following not appropriately being included in a draft EIR for the proposed project: 1.A failure to address impacts to water supplies for private, state, and federal wildlife refuges, particularly those south of the Delta. 2.Impacts on non-listed wildlife having a narrow focus. 3.Failure to include sufficiently robust monitoring and adaptive management plans.
326	Orion Camero	At the end of the day, the estuary is at risk. And its beauty and importance to the entire state needs to be preserved and stewarded for future generations, not rapidly deteriorated as a public resource for the benefiting water contractors of this project.
330	Sharon Jarvis	Well, I wouldn't want you to eat any fish that swim in the Smith Canal.
338	James McGraw	But besides from that, I'm looking at the cons. You're killing tons and tons of animals and fish that you may not consider animals, like others have said. You're destroying so much land. Water that used to be okay, but because of actions of you guys, it's no longer -- you can't even swim in it without, you know, seeing mutated fish or something like that.
346	Mariah Looney Restore the Delta	There are also 40,000 substance fissures in the Delta with a great number of these fissures residing in Stockton. Pollution will bioaccumulate, particularly mercury in fish populations during construction. Residents from disadvantaged communities, however, will continue to catch and eat polluted fish, despite education efforts, because there are no other available and affordable food sources for them.
387	Daphne Frost	Commenter raises concern for long-term water quality and health of the Delta.

398	Stephen Rosenblum	As Dr. White pointed out, the fish species are collapsing in the Delta already. They cannot stand any further stress -- especially in light of the reoccurring droughts we seem to be having -- of any more water exports to anyplace else.
410	Roger Thibault	I grew up on a boat in the Delta in the late 50's early 60's and the fish population was estimated by Fish and Game to be 17 million. Today the fish population is estimated at 4 million. How can anyone legitimately concerned about the environmental health of our State not see this huge decline as the "canary in the coal mine"? The bird populations have also plummeted.
449	Robert Weese Duhn	Concern for native fish and past promises that have not been kept by DWR to support these fisheries.
451	Jeanne France	Years ago there was too much water being taken out of the Delta. You're harming the Delta. You're harming the environment of the Delta. The fish cannot survive with more take of the Delta water. It must be allowed to flow to the seas. Recent studies have shown there's enough selenium in the Delta now that juvenile fish have deformed spines.
473	Luda Miller	This water that you're talking about and the increased water downstream, it threatens the salmon. We already have the science that shows that if you have the salmon collapse, you will have a major catastrophic environmental collapse. You allow the salinity to come back into the Delta, it will impact the farms that already have contracts that are required to it.
476	Pectah Ike Kinney	Fish need water. Let the water flow.
482	Chief Sisk Winnemem Wintu Tribe	The other is there needs to be a reorganizing of the south gates, necessary fish screens and the increase for Chinook. California needs to become a salmon state again. Get out of the desert. Let the fish come back because that's the health of community. That's the health of our rivers. That's how we're going to have clean water.
484	Raven Stevens We Advocate through Environmental Review (WATER)	We've seen the changing of policy or laws for corporate interests, which you might call family farms, and in turn the severe decline of Winter and Spring run Steelhead, Delta Smelt and Green Sturgeon.
488	Frank Toriello We Advocate through Environmental Review (WATER)	Scientists agree that allowing more, not less water to flow through the Delta and west towards San Francisco Bay is essential for protecting fish life and providing a clean supply of drinking water for current and future generations. That means restricting pumping of water out of the south end of the Delta into the Central Valley farmland. The National Oceanic and Atmospheric Administration has reported over 80 percent of collected fish exhibited spinal deformities due to selenium, yet the Central Valley Regional Water Board has issued a 25-year permit for toxic discharges of agricultural wastewater coming from the Westlands Water District into the San Joaquin River and the Delta and the Bay. This discharge is high in selenium, mercury, nitrates, pesticides and other toxins and is being discharged into the San Joaquin River and thus into the drinking water supply of Bay Area residents and millions of Californians.

489	Jack Trout	I've been a fly fishing outfitter up in Mount Shasta for 26 years, and I oppose the Delta Tunnel. The reason being is that I have seen such a decline in salmon populations in all rivers in Northern California. Do you realize at one time we had all the same salmon as they have now in Alaska. We've lost Kokanee. We've lost Sockeye. We've lost pink salmon. Two years ago the Department of Fish and Game here in Redding told me they came up with one pink salmon, okay. We've lost of our historical 22 salmon runs. There used to be salmon in the Sacramento River year-round. We've lost that now. We are on the brink of extinction. These salmon in the Fall when they spawn, they lay eggs. The eggs feed Steelhead and Trout. So with that, as we lose our salmon in the next coming 50 years, we will start to then lose our Steelhead populations and then, of course, Trout too because if you all look outside right now, there are no leaves on the trees, okay. Leaves hold insects. The Trout and Steelhead rely on the eggs of the salmon through the Winter months. So if we deplete our salmon populations, we will end up having no fish in our rivers.
497	Byron Nelson, Jr. Hoopa Valley Tribe	Since time immemorial, the fishery resources of the Trinity and Klamath Rivers have been the mainstay of the life and culture of the Tribe. The principal purpose of the Tribe's Reservation was to set aside sufficient resources of these rivers for the Indians to be self-sufficient and achieve a moderate standard of living based on fish (see citations in letter). Letter gives a history of government interventions on the Trinity River, including the authorization of the Trinity River Division of the Central Valley Project, the Central Valley Project Improvement Act, the 2002 Klamath River fish kill, etc. The current state of the fishery in the Klamath-Trinity river system remains unstable and imperiled due to continued federal mismanagement.
515	Lisa Combs	We will not have salmon.
516	Linda Hall	I am concerned about salmon and other species in the Delta that will be impacted by salt water intrusion.
528	Clare Rickard	Scientific analysis has shown that the tunnel will hurt salmon which will hurt the Bay and our water quality.
536	Jerry Willis	You are going to have problems with Corbicula flumenea clams.
542	Bruce Campbell	Evaluate what species are most likely to be impinged and entrained at each of the intakes, tunnel reaches, and pumping station screens associated with the DCP, and please explain how the augment rather than replace South Delta pumping station decision was made.
542	Bruce Campbell	Also, do not forget to analyze in terms of impacts (including from the construction phase) on year-round resident fish of the Delta such as the Delta smelt.,
543	Greg Knoblich	The long-term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
544	Betty Miller	The long-term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.

559	Rev. Dr. Richard Stinson Livingston United Methodist Church	I am concerned about the effect the project will have on current ecological balance.

561	Diane Riddle State Water Resources Control Board	The Project proposes additional hydro modifications to the Sacramento-San Joaquin Delta with construction and operation of two, new, additional points of water diversion and a tunnel to convey water from the northern Delta to the SWP pumping plant, and potentially the CVP pumping plant, in the southern Delta. The new points of diversion are proposed to be located on the banks of the Sacramento River in the northern Delta with a maximum diversion capacity of 3,000 cubic feet per second (cfs)each, 6,000 cfs combined. Currently, the SWP diverts water from the southern Delta at the SWP Banks Pumping Plant. The combined capacity of the CVP and SWP south Delta pumping plants is about 15,000 cfs, with median and maximum daily combined diversions of 6,854 and 13,720 cfs, respectively, since water year 2000 (Day flow). The maximum, combined diversion capacity of the new proposed intakes (6,000 cfs) is about forty percent of the maximum diversion capacity of the existing southern Delta intakes (15,000 cfs). DWR refers to the operation of the new intake facilities and conveyance to the south Delta in combination with the existing diversion facilities as "dual conveyance. "The Bay-Delta ecosystem and freshwater ecosystems in tributary watersheds are in a state of prolonged decline. Fish species in the Bay-Delta have continued to experience precipitous declines in recent years. In the early 2000s, scientists noted a steep and lasting decline in population abundance of several native estuarine fish species, which continued and worsened during the sustained drought during 2012-2016. Simultaneously, natural production of all runs of Central Valley Chinook salmon and steelhead remains near all-time low levels. Changes in land use due to agricultural practices, urbanization, and flood control combined with substantial and widespread water infrastructure development, including the construction and operation of the SWP and CVP, have been accompanied by significant declines in nearly all species of native fish. The SWP and CVP facilities are the largest contributors to hydromodification in the freshwater and estuarine ecosystems of the San Francisco Bay-Delta estuary and freshwater tributary watersheds. Modification to the volume, pattern, and timing of flows caused by the dams, water diversions, canals, and related operation of the CVP and SWP have contributed to declining fish populations, contraction of the freshwater and estuarine habitats and food webs, and persistently poor aquatic ecosystem conditions. The new conveyance facility and dual conveyance operations of the Project have the potential to reduce the impacts of the SWP (and possibly the CVP) on aquatic resources by reducing entrainment at the southern Delta export facilities, reducing reverse flows in the southern Delta, and allowing more water to be exported during high flow conditions when aquatic resources are less likely to be adversely affected. If not appropriately conditioned, however, the Project also has the potential to adversely affect aquatic resources by modifying the timing, volume, and duration of freshwater flows and tidal energy that influence the amount of aquatic habitat and water quality habitat conditions such as freshwater flow, salinity, dissolved oxygen, turbidity, and temperature. In particular, adding new water diversion facilities closer to the major migratory routes of vulnerable fish populations, such as Sacramento River Chinook salmon (all runs), has the potential to expose these species to greater risks and impacts as compared to current conditions. Sacramento River Chinook salmon, sturgeon, and other species such as Sacramento splittail are not currently exposed at close proximity to diversion facilities of the proposed size and capacity of the new intakes, which may modify flow signals and impact habitat

characteristics. As stated above, the new intake facilities may reduce some adverse effects of the existing southern Delta pumps on Sacramento and San Joaquin River Chinook salmon and steelhead; however, the new north Delta facilities will introduce new entrainment and impingement risks. The EIR should evaluate multiple fish species and communities to determine if there are potentially significant environmental effects to aquatic resources that could be caused by the Project and propose appropriate mitigation or avoidance measures. Specifically, the EIR should evaluate the timing and volume of flows in the tributaries and Delta outflows, potential for entrainment and impingement at new north Delta intakes as well as existing south Delta intakes, temperature effects, and impacts of reverse flows near the new intakes and in the interior Delta caused by the new and existing diversion facilities. The following list includes fish species that should be evaluated in the EIR at the life-stage and population level to determine the potential for the Project to cause significant environmental effects and appropriate avoidance and mitigation measures. CESA and ESA Endangered Sacramento River winter-run Chinook salmon (Oncorhynchus tshawytscha) CESA and ESA Threatened Central Valley spring-run Chinook salmon (0.tshawytscha) ESA Threatened Central Valley Distinct Population Segment (DSP) steelhead (0.mykiss) ESA Threatened Green Sturgeon southern DPS (Acipenser medirostris), and White Sturgeon (Acipenser transmontanus ESA Endangered Killer whale Southern Resident DSP (Orcinus area) ESA Threatened Delta smelt (Hypomesus transpacificus) CESA Threatened Longfin smelt (Spirinchus thaleichthys) Sacramento splittail (Pogonichthys macrolepidotus) Starry flounder (Platichthys stellatus) California Bay shrimp (Crangon franciscorum) Zooplankton (Neomysis mercedis, Eurytemora affinis, and Pseudodiaptomus forbesi) Non-native species: American shad (Alosa sapidissima), Striped bass (Morone saxatilis), Largemouth bass (Micropterus salmoides), and other ecological and fishery species of concern Potential ecological effects to fish populations and the lower food web (e.g., phytoplankton and zooplankton biomass and flux) should also be summarized and presented in the EIR using methods that clearly identify and isolate the effects of alternatives and the baseline condition so that they can be easily compared. Finally, the EIR should define specific operating criteria and mitigation measures to avoid or reduce impacts to fish populations and aquatic resources. The EIR should include an assessment of the effects of the Project alternatives and operating scenarios on populations of fish and aquatic species. Previously, the EIR/EIS for the BDCP/WaterFix assessed the impacts of that project on aquatic species at a regional or division scale and a single action or component of that project on a specific life stage(s). For example, the BDCP/WaterFix EIR/EIS analyzed the following impacts of WaterFix Project operations to winter-run Chinook salmon separately for each life state: spawning and egg incubation, juvenile rearing habitat, juvenile emigration, juvenile entrainments, and adult migration conditions that would occur at different locations and attributable to different project components (e.g., upper Sacramento River, upstream of the Delta, through-Delta, south Delta water export facilities, the proposed north Delta intake facilities, and predation impacts).(BDCP/WaterFix Final EIR/EIS, Chapter 11 Fish Aquatic Resources.) However, those site-and life stage-specific effects analyses did not identify the cumulative population-level impacts (e.g., winter-run Chinook salmon population change over generations) of the project and operating scenarios. Additionally, the EIR should evaluate the Project

		effects on sustainability of listed species in the project area based on the population, evolutionarily significant unit (ESU), or distinct population segment (DPS). For salmonid species, viable salmonid population (VSP) parameters should be evaluated. A similar approach using VSP-equivalent parameters could be employed to assess population effects on listed fish species (e.g., Delta smelt and longfin smelt) as recommended by the Independent Scientific Advisory Panel(2019).
566	Marie Grant	Examine and report on probably effects on fish.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	The DEIR should consider effects on Fish and Wildlife Upstream of the Delta: The DEIR must consider potentially significant effects of upstream operations of the CVP and SWP in light of climate change, including: a. the effects of changes in instream flows on survival of salmon and other fish migrating downstream; b. the effects of water temperatures on salmon and other fish species that spawn and rear below dams, as a result of SWP/CVP reservoir storage and releases; c. the effects of redd dewatering on salmon as a result of CVP/SWP operations.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	The DEIR should consider effects on Fish and Wildlife in the Delta: The DEIR must consider potentially significant effects of CVP and SWP operations in the in light of climate change, including: a. The effects of entrainment, salvage and loss of all four runs of Chinook salmon, Delta Smelt, Longfin Smelt, steelhead, sturgeon, and other native fish and wildlife; b. The effects of SWP/CVP operations on survival of all four runs of salmon through the Delta, including effects of Old and Middle River flows, import: export ratios, Delta Cross Channel gate operations, and Sacramento River flows at Freeport; c. The effects of increased entrainment and loss of sediment and reduced turbidity downstream of the proposed new Delta conveyance facility on Delta Smelt, longfin smelt, all four runs of Chinook salmon, and other species; d. The effects of reduced flows below the proposed North Delta conveyance intakes on survival of salmonids through the Delta; e. The effects of Delta outflow on the abundance and survival of Longfin Smelt, Delta Smelt, salmon, and other species.
572	Katja Irvin	Impacts to water quality and biological resources (especially listed species) must not be analyzed using the latest biological opinions from the Trump Administration. Please use the same methodology and biological data/analysis as used by the SWRCB to formulate the Bay-Delta Plan.
573	Jennifer Olguin	This shameful project should be terminated immediately as its construction will drive the Chinook Salmon to extinction and hence devastate the Winnemem Wintu Tribe and moreover over a hundred species will follow, facing extinction.

573	Jennifer Olguin	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent does the DWR plan to forecast and mitigate the environmental impacts of the project on Delta ecosystems? How will Delta Smelt and other Delta species, such as salmonids and aquatic flora, be affected? Will the DWR accept analysis on this matter from scientists not employed by the State of California?
576	Kelley Taber Sacramento County Water Agency	Impacts to Folsom Reservoir storage and releases have the potential to result in significant impacts to sensitive fish species in the lower American River, including steelhead listed under the federal and state ESAs and fall-run Chinook salmon. Sacramento County Water Agency coordinates management of the lower American River fishery through the Sacramento Water Forum. The health of the lower American River's aquatic resources are connected to operations of Folsom Reservoir. Reduced Folsom Reservoir storage could cause significant impacts to sensitive fish species in the Lower American River due to a reduced cold-water pool in the reservoir and resulting high water temperatures in the river. The EIR must analyze the impacts that lower Folsom Reservoir storage may have on the lower American River fisheries. The EIR's analysis of hydrologic and fisheries effects should incorporate the Modified Flow Management Standard for the lower American River developed by the Sacramento Water Forum, which has goals of protecting anadromous salmonids and avoiding catastrophic water shortages in the basin.
577	Alexa Kerr	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
577	Alexa Kerr	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.

578	Jacob Foley	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
578	Jacob Foley	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
579	Genesis Mendoza	This shameful project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction and hence devastate the Winnemem Wintu Tribe and moreover a hundred species will follow, facing extinction
579	Genesis Mendoza	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
580	Diana Garcia	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
580	Diana Garcia	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.

581	Rachel Huang	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
581	Rachel Huang	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
583	Lorenzo Castaneda	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
583	Lorenzo Castaneda	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
584	Georgia Steinheimer	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.

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585	Phoebe Lawton	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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586	Miranda O'Brien	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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587	Jennifer Martinez	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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588	Siena Hooper	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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589	Elvia Cruz	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.

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590	Luis	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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591	Cynthia Torres	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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592	Selenia	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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593	Gabriel van Praag	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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594	Arisbeth Cruz	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.

594	Arisbeth Cruz	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
595	Arushi Lakhan-Pao	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
595	Arushi Lakhan-Pao	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
596	Malei Guzman	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
596	Malei Guzman	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.

597	Dang Nguyen	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
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598	Bill Emlen Solano County	Alterations to freshwater flows in the Delta, both during construction and as part of facility operations, would tremendously impact threatened and endangered species that rely on water flows of adequate quality and quantity from the north of the Delta. The EIR must fully analyze the potential impacts to aquatic resources and potential increases of invasive species that pose additional pressures on threatened and endangered species.
599	Michelle Huang	This damaging project should be terminated immediately as its construction and operation will drive the Chinook Salmon to extinction, with over a hundred species following, devastating the Winnemem Wintu Tribe, local fisheries, and the beautiful ecosystem we currently have and need.
599	Michelle Huang	Finally, this project will endanger the Chinook salmon, which is a keystone species that for millennia has been providing nutrients for the soils and nourishing a hundred species that depended on them. Some of the species that depend on the Chinook Salmon are: Black bears, Grizzly Bears, and American badgers, Water shrews, Ringtail cats and Long-tailed weasels, Harbor seals, Great blue herons, and Great egrets, Bald eagles, orcas, and ravens, wolves, North American River otters, ermine, fox, martens, bobcats, ducks, pumas, 'coons, and sharks. These species are crucial to California wildlife and waterways, without them the biodiversity of California will plummet and drive more extinction. The delta tunnel will heavily contribute towards the extinction of Chinook salmon since last year, only 0.1% of the salmon came back! Much of the species living in the area require salmon to continue living and therefore their extinction will change the ecosystem in the region.
623	Bob and Carolyn Graham	The long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
624	Gabrielle Tetreault	The long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.

637	Osha Meserve Local Agencies of the North Delta	The draft EIR must analyze likely impacts on all fisheries resources in the vicinity of the proposed intakes. It would not be adequate for the Draft EIR to only focus on potential impacts to listed fish species… there are likely fish in the vicinity of the proposed North Delta Diversions throughout the year. Impacts to those fish, whether they are listed or not, must be disclosed and mitigated. Many of these fish have recreational values, and are also tribal trust species for Native American tribes. In addition, bypass flow criteria and screening standards must be developed to protect all fishery resources, not just listed fish.
662	John McManus Golden Gate Salmon Association	The DEIR should consider effects on Fish and Wildlife Upstream of the Delta: The DEIR must consider potentially significant effects of upstream operations of the CVP and SWP in light of climate change, including: a. the effects of changes in instream flows on survival of salmon and other fish migrating downstream; b. the effects of water temperatures on salmon and other fish species that spawn and rear below dams, as a result of SWP/CVP reservoir storage and releases; c. the effects of redd dewatering on salmon as a result of CVP/SWP operations.
662	John McManus Golden Gate Salmon Association	The DEIR should consider effects on Fish and Wildlife in the Delta: The DEIR must consider potentially significant effects of CVP and SWP operations in the in light of climate change, including: a. The effects of entrainment, salvage and loss of all four runs of Chinook salmon, Delta Smelt, Longfin Smelt, steelhead, sturgeon, and other native fish and wildlife; b. The effects of SWP/CVP operations on survival of all four runs of salmon through the Delta, including effects of Old and Middle River flows, import: export ratios, Delta Cross Channel gate operations, and Sacramento River flows at Freeport; c. The effects of increased entrainment and loss of sediment and reduced turbidity downstream of the proposed new Delta conveyance facility on Delta Smelt, longfin smelt, all four runs of Chinook salmon, and other species; d. The effects of reduced flows below the proposed North Delta conveyance intakes on survival of salmonids through the Delta; e. The effects of Delta outflow on the abundance and survival of Longfin Smelt, Delta Smelt, salmon, and other species.
674	David Guy Northern California Water Association	In addition, the draft EIR must demonstrate that the Delta Conveyance Project can avoid significant impacts to salmonids and pelagic fish in the Sacramento Valley.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	The NOP indicates that DWR will address "Fish and Aquatic Resources: effects to fish and aquatic resources from construction and operation of the water conveyance facilities" in its DEIR. NOP 9. Impacts to fish are particularly important. Seventeen species of fish endemic to the Delta have already gone extinct; just twelve indigenous species remain. Critical habitat for the endangered Sacramento River winter run Chinook salmon, Central Valley steelhead and spring run Chinook, Delta smelt, longfin smelt, and the Southern Distinct Population Segment ("DPS") of the Northern American green sturgeon is experiencing progressively worsening degradation. The DEIR must evaluate how these species will be impacted by construction and operation of the proposed Project, including impacts from the Project's reasonably foreseeable alterations to SWP and CVP operations, both upstream and downstream of the proposed Project's physical facilities.

701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	In examining the Project's impacts on fish, the DEIR must detail how the Project's intakes and alterations to river hydrology will impact Delta smelt, Longfin smelt, Sacramento splittail, white sturgeon, green sturgeon, Pacific lamprey, river lamprey, and Central Valley steelhead which are likely to be in the vicinity of the proposed Project's north Delta diversion. This discussion must include analysis of sweeping velocities at the north delta diversion during different operational conditions and their impacts on fish entrainment.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	The DEIR must also detail the Project's impacts on flows - including information on inflow and outflow - during different operational conditions, and resultant changes in water quality, including temperature, salinity, turbidity, and other pollutants. This analysis is necessary to disclose impacts on salmonids, which depend on cool waters for survival.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR must not rely upon separate agency review under the Endangered Species Act ("ESA"), 16 U.S.C. section 1531 et seq. as a substitute for appropriate CEQA analysis. Analysis under the ESA examines whether an activity is "likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of [critical] habitat of such species." 16 U.S.C. § 1536(a)(2). The scope and detail of this analysis is far more limited than the broader evaluation required under CEQA, which instead asks whether a Project would have a significant impact. Significant impacts can occur at levels of disturbance that are far below those that would jeopardize a species' survival.
702	Frank Toriello We Advocate Through Environmental Review	We demand that the DWR conduct its own evaluation of environmental impacts and impacts to endangered, sensitive, and at risk species in the Delta relying on sound peer reviewed literature, not the politically motivated "Biological Opinion."
702	Frank Toriello We Advocate Through Environmental Review	The EIR must also evaluate the impact of the project's infrastructure and operation on the viability of the passageway in the Delta for outgoing and returning spawning salmon, other anadromous and migratory fish and freshwater Delta species.
702	Frank Toriello We Advocate Through Environmental Review	The EIR must include studies of the entire Sacramento River system, including its tributaries and the headwater region above the Shasta dam: the Pit River, the Upper Sacramento River, and the Wild and Scenic McCloud River.

705	Roger Mammon	Will anadromous fish such as salmon, green sturgeon, white sturgeon and striped bass be negatively affected by tunnel operations.
710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	Moreover, significant environmental impacts to protected fish species occurred, primarily because the low reservoir storage resulted in increased water temperatures in the lower American River with consequent impacts on the river's steelhead and salmon. Such low storage also threatened significant water supply impacts to the 500,000 people who receive water directly from the reservoir, water suppliers who divert water downstream, and groundwater-dependent agencies whose supplies are affected by increased pumping.
726	Roger Cornwell Sacramento River Settlement Contractors	In addition, the draft EIR must demonstrate that the Delta Conveyance Project can avoid significant impacts to salmonid and pelagic fish species in a manner that avoids re-directed impacts to water supplies in the Sacramento Valley.
728	Jem Unger Hicks	The delta tunnel will heavily contribute towards the extinction of Chinook salmon, most importantly, last year, only 0.1% of the salmon came back!
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (D) The potential effects on migratory fish and aquatic resources.
750	David Guy Northern California Water Association	In addition, the draft EIR must demonstrate that the Delta Conveyance Project can avoid significant impacts to salmonids, pelagic fish, and birds in the Sacramento Valley.
774	Don Hankins California Indian Water Commission	The project should seek to comprehensively recover species and ecosystems prior to any diversion. There is sufficient data to demonstrate the flow requirements necessary for fisheries survival and recovery, but that is not necessarily sufficient to achieve ecosystem function. A functioning ecosystem is critical to the quality of water, economy, and other attributes of the region.

776	Lawrence Goldzband San Francisco Bay Conservation and Development Commission	The DEIR should address any possible impacts to listed and critical species ecosystem health, and address maintaining fish population levels to support recreational fishing industries in the Marsh and Bay. These may include water quality impacts, such as decreased water quality of Delta waters flowing to the Bay.
779	Carol Kennedy and Bobby Ferreira	The way of life out here is surrounded by water. Boating, water sports of every kind, swimming and just plain enjoying the wild life. We have hundreds of species of fish and game. Where are they to go?
787	William Huber	We live in Hyampom, in Trinity County, on the South Fork of the Trinity River. By the odious act of the construction of Trinity Dam, we are connected to the greater plumbing systems put in place by BOR and the CVP. No, water does not flow uphill, but when it doesn't flow downhill, in the main stem Trinity River, it affects the South Fork. Specifically, the fisheries. When Salmon return to the Klamath-Trinity watershed from the ocean, their survival is dependent on water. Trinity Dam effectively cut off that water since the dam was closed and excellent spawning habitat was flooded and cut off in 1965. Minimal summer releases from the dam and ineffective mitigation measures such as the Lewiston hatchery have diminished salmon populations despite many measures attempting to bolster them as a result of the 2002 record of decision which increased minimum flows 200%. (It's still only 47% of total River flows.) Fish counts at Willow Creek make little distinction between mainstem and South Fork Trinity River fish. All fish are counted the same and receive the same assaults on their survival. As the mainstem fisheries decline, so do South Fork Trinity River fisheries.
788	Jill North	Fishing is a major industry for commercial and native Americans and to remove fresh water that allow fish to live and thrive and send it south is absurd. As a consequence the Delta will become more saline which will not provide habitable water for fish. We lose an industry.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy G P1, subsection (b)(4) (Cal. Code Regs., § 5002, subd. (b)(4)) requires that ecosystem restoration and water management covered actions include adequate provisions, appropriate to the scope of the action, to assure continued implementation of adaptive management. This requirement is satisfied through: a) the development of an adaptive management plan that is consistent with the framework described in Appendix 1B of the Delta Plan (https://deltacouncil.ca.gov/pdf/delta-plan/2013-appendix-b-combined.pdf), and b) documentation of adequate resources to implement the proposed adaptive management plan. Considering the water management components of the Project, an adaptive management plan will be required that addresses Project construction activities, implementation, and ongoing operations. Ecosystem restoration components of the Project would also require DWR to prepare an adaptive management plan.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy ER P5 (Cal. Code Regs., tit. 23, § 5009) requires that the potential for new introductions of or improved habitat conditions for nonnative invasive species, striped bass, or bass must be fully considered and avoided or mitigated in a manner that appropriately protects the ecosystem. The EIR should analyze how the Project would avoid or mitigate introductions or improved habitat conditions for nonnative invasive species, striped bass, or bass. Proposed mitigation and minimization measures should be consistent with, and equally or more effective than, those identified in the Delta Plan MMRP (https://www.deltacouncil.ca.gov/pdf/delta-plan/2018-appendix-o-mitigation-monitoring-and-reporting-program.pdf), including Delta Plan Mitigation Measure 4-1, which requires development and implementation of an invasive species management plan for any project where construction activities or operations could introduce or facilitate establishment of invasive species.
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: Thorough analyses of potential impacts of Project construction and operations and maintenance to terrestrial and aquatic species for each Project alternative with consideration of different tunnel alignments and footprints and a range of conveyance capacities.
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: An analysis that considers Project impacts in comparison to the existing species and environmental conditions including habitat restoration projects that have been completed. The EIR's cumulative impacts analysis may consider the impacts of probable future projects, including habitat restoration actions that are expected to be completed.
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: Biological analyses and Project operations that: Consider the need to minimize potentially significant Project impacts to aquatic species by life stage including, for example, the Project's impacts on longfin smelt juveniles as a result of reduced spring flow, the Project's impacts on Delta smelt juveniles as a result of impacts to summer-fall habitat conditions, Project impacts on Chinook salmon juveniles as a result of reduced through-Delta survival, the Project's impacts on Delta smelt habitat in the vicinity of the north Delta intakes, and the Project's impacts on aquatic species as a result of entrainment into Project facilities; Consider known impacts to species and status of the species as a result of cumulative effects of the Project in connection with the effects of past, present, or reasonably foreseeable future projects, including the operations of the CVP; Disclose and analyze any significant Project impacts to non-CESA listed species, such as fall-run Chinook salmon and steelhead, and species of recreational importance, and if necessary, measures to reduce impacts to less than significant levels.
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: Minimization measures (e.g., Project operations, construction monitoring)that minimize impacts as a result of construction of the Project facilities on terrestrial species, including giant garter snake and Swainson's hawk, and aquatic species including Delta smelt, longfin smelt, and Chinook salmon.

801	Denise Louie	I am extremely concerned about species we humans have brought to the edge of extinction, including salmon and Delta smelt. The Delta Conveyance project should not be done when the fish need increased unimpaired flows of fresh, cool water in order to survive.
805	Ashwani K. Rana	The long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
817	Thomas J. Slater RD 999	Hurting fish populations and damaging the environment should not be part of the Conveyance Project. The NOP states it is intended to be operated in coordination with the existing south Delta pumping facilities, resulting in a system also known as "dual conveyance" because there would be two complementary methods to divert and convey water. This Dual Conveyance system approach needs more scientific review in the EIR than in the previous WaterFix EIR.
820	Clark Tuthill	Taking additional water out of an already stressed system will not only create additional environmental problems to the south, but will also place most all fish species under circumstances that could easily lead to extinction.
865	Phyllis Bala	— The devastating effect of reduced Sacramento and Trinity water flows on the already suffering salmon, delta smelt and other aquatic wildlife
880	Muriel Strand	7. How will the ecological health of the Bay-Delta region be ensured now and in the future?
889	Todd Scruggs	Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta.
901	Michael Davis	This tunnel/shaft will impact the Delta water flow/wild life and create reverse flow from the ocean.
902	Justin & Nicole Raleigh	The Delta has drastically changed over the last 10 years. What used to be clean clear water, now looks brown or green. Algae consumes many areas that were once clear of it, the fish population has greatly diminished, and more and more I see dead bloated fish and birds when out fishing. I firmly believe that this is from the increase pull of fresh water and the increased chemical treatment of the aquatic vegetation. Stop abusing and killing one of California's and our nations greatest natural resources. We have the technology to find a better way and pillaging the Delta.
902	Justin & Nicole Raleigh	The consumption and extraction of fresh water from the south Delta is causing fish death, decreased populations of our natural fish and bird species, and blue green algae in many parts of the Delta, especially Discovery Bay. This additional tunnel and increased extraction will increase the salinity content and brackish water. Which will further kill our native fish populations and increase the risk of aquatic vegetation decomposition, which intern will increase the risk of toxic water and algae growth. The enlarged bay will also cause the potential for more mesquites and the diseases they carry infesting areas like Discovery Bay.
957	Martin Freitas	Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife. Please do not move forward with this plan.

960	John Hoffman	Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
973	Laurie Yglesia	- Long term issues with removing water north of the Delta instead of allowing it to flow through the Delta.
997	Cristina Mathews	Governor Newsom's tunnel plan not only dooms fish populations to extinction, but if further erodes the ability of California's coastal communities to make a living from the sea.

Table D-23. Comments Regarding Biological and Terrestrial Resources

Letter	Commenter Name, Affiliation	Comment Text
29	Hope Salzer	The EIR must analyze the tunnel's cumulative and collective impacts, with particular focus on: biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected;
61	Janice Gloe	A tunnel at the Delta will destroy the ecosystem of the Delta and affect the ecosystems of the Sacramento River, American River, other rivers and the tributaries!
105	Randa Solick	I'm against one - or two - tunnels, which will negatively affect the species and plants in the Delta's ecosystem, according to scientists who live there. The Delta needs MORE water, not less. So the Governor's one-tunnel plan has to do both things, protect the Delta ecosystem and provide more reliable water for California. Please use real science to counter Trump's threatened lawsuit. Stop this plan.
115	Susan Simpson	With all the destruction, the wildlife will desert the area. It will be uninhabitable. Do we think they will ever return? Will the people of Hood, Locke and Clarksburg ever return? All this expense and hardship, for what….
118	Denise Louie	My message is simply that any water exports to SoCal and construction of the Delta tunnel must abide by California's Biodiversity Initiative, which mandates protection and restoration of habitat for local native plants and wildlife that co-evolved with them. Delta smelt, for example, have been imperiled for decades, as have salmon runs that depend on cool, clear, unimpaired freshwater flows. California is a biodiversity hotspot, meaning we are blessed with an abundance of diverse species, many of which we humans have brought to the brink of extinction. San Francisco and the Bay are named for St. Francis, patron saint of ecology. It is our moral imperative, our ethical obligation, to protect species other than our own. Because all species lives matter.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. Both routes the tunnel could take is a critical issue and requires careful and thorough analysis by DWR. To run a tunnel through sensitive wildlife habitat that has been protected for many years is no more acceptable than taking productive farmland. The Delta is a critical stop on the Pacific Flyway as overwintering places have been reduced already. The Stone Lakes and Cosumnes River Preserve as well as fallow fields throughout the western side of the Delta are critical stopping points for geese, ducks and the endangered Sandhill Cranes. Both projected routes would seriously endanger these important wintering areas for many, many species.
145	Meredith Cooper	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected;

160	Diane Kirkham	Commenter cites the following reasons for concerns regarding the Launch Shaft Site A for the Central Corridor for the proposed Delta Conveyance Project as being currently discussed by the Delta Conveyance Design and Construction Authority. (I believe that this is now also the preferred site for Launch Shaft Site A for the Eastern Corridor as well.) 1. Swainson's Hawk Easements. The site is spliced between two properties that are part of the City of Elk Grove's Swainson's Hawk Mitigation Program. Directly adjacent to the proposed site, on the south, is a 170-acre property where the City of Elk Grove holds a Swainson's Hawk Conservation Easement. In addition, adjacent to the proposed site on the north, is a 736-acre property where the City of Elk Grove also holds a Swainson's Hawk Conservation Easement. The noise, vibrations, traffic, and all manner of intense human activity that this site will bring to the area will have an extremely negative impact on the Swainson's hawks that frequent this area. Furthermore, utilizing this site for construction activities will take the 500 acres out of its current use -- irrigated pasture -- which is extremely beneficial for the foraging activities of the Swainson's hawks.
195	David Fries Conservation Chair San Joaquin Audubon Society	There needs to be protection for all bird species that are present in the Delta. The project proponents cannot rely on the California Natural Diversity Database to determine whether species are present. Thorough surveys must be done before the project design is determined and the EIR is written, so that the full cost and extent of destruction and/or disruption of the bird species and the habitats on which they are dependent for survival can be evaluated for each alternative, and avoided and mitigated before construction starts. This is especially necessary for all species that are endangered, protected and/or listed as species of special concern. However, the Public Trust Doctrine provides that the state should conserve all species and the habitats on which they are dependent for survival.
195	David Fries San Joaquin Audubon Society	To avoid decimating endangered or threatened bird populations, mitigation for lost habitat must be completed and proven effective before any existing habitat can be destroyed or disrupted. · Landscape influences in habitat restoration and/or creation is critical as is recently described by Shuford et al. (The Relative Importance of Agricultural and Wetland Habitats to Waterbirds in the Sacramento-San Joaquin River Delta of California, San Francisco Estuary and Watershed Science, vol 17, issue 1, article 2, 2019." In the conclusion of the article it states: "Given the great uncertainty in the future extent and pace of habitat loss and degradation in the Delta - but with rapid or catastrophic change certainly possible - prioritizing the conservation action needed to maintain robust waterbird populations in the region is urgent."
265	Molly Culton Sierra Club of California	Analyze impacts to biological resources, including all species that may be impacted by the state water project as well as upland habitants that may be affected,

313	Mike Lynes Audubon California	It is reasonable to assert that past concerns as stated in the following text are relevant to the current Project and therefore should be addressed at this early stage of Project development. In its letters of July 23, 2012 and May 24, 2013, the Central Valley Joint Venture ("CVJV"), of which Audubon is a member, stated that the BDCP should improve—not compromise—efforts to conserve wildlife and habitat in and around the Delta. In its May 24,2013 letter, the CVJV recommended that "all Delta-related planning efforts, including BDCP...adopt a goal to contribute to the attainment of the acreage, water and bird population goals set forth by the Central Valley Joint Venture Implementation Plan."
341	Dante Nomellini, Sr. Central Delta Water Agency	We cannot sustain ten years of a construction project. Wildlife is going to be totally devastated by the activity.
351	Dave Fries National Audubon Society, San Joaquin Chapter	First of all, there needs to be protection for all the bird species there. The project proponents cannot rely on the California Natural Diversity Database to determine whether species are present. Thorough surveys must be done before the project design is determined and the EIR is written, so that the habitats -- so that full cost and extent of destruction and/or disruption of the birds species and the habitats on which they are dependent for their survival can be evaluated, and they can be avoided, and they have to be mitigated before construction can start. This is especially necessary for all species that are endangered, protected, and are listed as species of special concern.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: • biological resources, especially all endangered aquatic species that may be impacted by the SWP-- Sacramento River winter, spring & late fall-run Chinook salmon; Delta smelt and green sturgeon--as well as species in upland habitats that may be affected by the project.
366	Matt DeWalt	I'm just looking at the topics that are included in that, and I wanted to know if that includes the impact on animal species, like birds, beavers, otters, turtles, things like that?
404	Dr. Steven White	There are a whole bunch of biological issues that I would like to see addressed that would involve looking at assemblages in the different environments. Looking at estuary metrics, at river metrics.
475	Susan Murray	When we had -- when we had the drought, a number of the trees died because of the drought, and so when we had the Carr Fire that happened over a year ago, people have indicated that because of the drought that we had the trees were no longer -- whether they were sustainable or they were dying, and that's why we had such a terrific fire for the Carr. We need the water to have sustainable trees.
515	Lisa Combs	Hundreds of wildlife and plants are going to go extinct.
540	Cheryl Madrigal Rincon Band of Luiseño Indians	The Band is concerned that the proposed tunnel could largely affect the biodiversity within our Traditional Use Area (TUA). In particular, the Band is concerned how the tunnel would impact migration patterns of birds and other wildlife as surface waterflow will be changed due to the proposed project. The Band asks that there will be more research done to determine if the proposed tunnel will impact wildlife from migrating into southern California. Wildlife is a significant element within the belief system of our people and the Rincon Band seeks to maintain a balanced eco-system.
566	Marie Grant	Examine and report on probably effects on wildlife and endangered species.

566	Marie Grant	Examine and report on probably effects on wetlands.
570	Natural Resources Defense Council, Defenders of Wildlife, The Bay Institute, and San Francisco Baykeeper	The DEIR should consider effects on avian and terrestrial species: The DEIR must consider potentially significant effects of project construction and CVP and SWP operations on avian and terrestrial species, including: a. Impacts to wildlife in south of Delta wildlife refuges from changes in water supply; b. Construction impacts to wetland-dependent wildlife in the Delta; and c. Impacts to wildlife from increased frequency and/or extent of crop-idling water transfers.
571	Karen Jacques	The EIR should analyze impacts to biological resources including all impacted and potentially impacted species (some of which are already listed as endangered) and their habitats, including upland habitats.
662	John McManus Golden Gate Salmon Association	The DEIR should consider effects on avian and terrestrial species: The DEIR must consider potentially significant effects of project construction and CVP and SWP operations on avian and terrestrial species, including: a. Impacts to wildlife in south of Delta wildlife refuges from changes in water supply; b. Construction impacts to wetland-dependent wildlife in the Delta; and c. Impacts to wildlife from increased frequency and/or extent of crop-idling water transfers.
673	Jan Hagen	Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
674	David Guy Northern California Water Association	The draft EIR must demonstrate that the Delta Conveyance Project can avoid significant impacts to birds in the Sacramento Valley.
702	Frank Toriello We Advocate Through Environmental Review	Impacts to water quality, fish and wildlife in the Delta need to be studied
705	Roger Mammon	What affect will the tunnel have on migratory birds that depend on the Pacific Flyway as their wintering grounds?
708	David Mooney Bureau of Reclamation	Reclamation requests the following: a clear delineation between the existing biological monitoring requirements within the Delta and the monitoring requirements resulting from changes in system wide programs due to the addition of the Delta Conveyance Project.

720	Eric Gillies State Lands Commission	The Draft EIR should disclose and analyze all potentially significant effects on sensitive species and habitats in and around the Project area, and if appropriate, identify feasible mitigation measures to reduce those impacts. Sensitive species include special-status wildlife, fish, and plants which will be present within the proposed Project footprint. DWR should conduct queries of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database and U.S. Fish and Wildlife Service's (USFWS) Special Status Species Database to identify any special-status plant or wildlife species that may occur in the Project area. Identification of rare and sensitive plant species should be reviewed with various California Native Plant Society databases and information sources. The Draft EIR should also include a discussion of consultation with CDFW, USFWS, and National Marine Fisheries Service(NMFS)as applicable, including any recommended mitigation measures and potentially required permits identified by these agencies.
720	Eric Gillies State Lands Commission	Invasive Species: One of the major stressors in California waterways is introduced species. Therefore, the Draft EIR should consider the Project's potential to encourage the establishment or proliferation of aquatic invasive species (AIS) such as the quagga mussel, or other nonindigenous, invasive species including aquatic and terrestrial plants. For example, construction equipment brought in from long stays at distant projects may transport new species to the Project area via hull biofouling or found in soil transport of work and hauling vehicles. Marine and aquatic organisms attach to and accumulate on the hull and other submerged parts of a vessel. Plant invaders may disperse seeds from one area to another via dried mud/soils attached to vehicles from previous work areas. If the analysis in the Draft EIR finds potentially significant AIS and plant impacts, possible mitigation could include contracting vessels from nearby, or requiring contractors to perform a certain degree of hull and vehicle-cleaning. The CDFW's Invasive Species Program could assist with this analysis as well as with the development of appropriate mitigation (information athttps://www.wildlife.ca.gov/Conservation/Invasives).
720	Eric Gillies State Lands Commission	The Draft EIR should also evaluate noise and vibration impacts on wildlife and birds from construction. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and NMFS. Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.
721	Michael McDowell Double M Farms	I request the EIR address ecological impacts on migratory species, especially the Greater Sandhill Cranes.
746	Friends of Stone Lakes National Wildlife Refuge	Stone Lakes NWR and its surrounding agricultural areas are home to several special status species, including the tri-colored blackbird, greater sandhill crane, white-face ibis, long-billed curlew, Swainson's hawk, burrowing owl, giant garter snake and valley elderberry longhorn beetle. The refuge is already imperiled and constrained by urbanization close to its northern and part of its eastern border. A project of the magnitude of the Delta Conveyance has the very real potential of diminishing the geographic range of some of the species the refuge is designed to protect, like the greater sandhill crane.

746	Friends of Stone Lakes National Wildlife Refuge	The new haul roads would transect the Sone Lakes NWR and adjacent waterfowl foraging areas. Based on the experience of Stone Lakes NWR staff, the new haul roads will flush many waterfowl. The EIR must identify waterfowl roosting and foraging sites, particularly with respect to the fully protected greater sandhill cranes, and evaluate the potential impact of haul road traffic on their movement. This analysis should be conducted in conjunction with the potential impact of birds being flushed into any proposed new power lines along the road
746	Friends of Stone Lakes National Wildlife Refuge	Crane foraging habitat must be included in transmission line impacts. In evaluating the impacts of transmission lines on waterfowl, particularly greater sandhill cranes, foraging habitat is equally important as roosting habitat. The analysis must use mapped data on moderate to high probability foraging areas proximate to roosting sites in considering the potential for species take associated with power line contact.
746	Friends of Stone Lakes National Wildlife Refuge	Impacts of tunnel muck material storage site on adjacent Swainson's Hawk preserve must be evaluated. The "RTM Storage area" shown in DCA Stakeholder meeting materials between Franklin Blvd and Interstate 5 is just to the south of a Swainson's Hawk mitigation site. Activity at this site could impact hawk nesting and foraging and must be evaluated
746	Friends of Stone Lakes National Wildlife Refuge	Impact of tunnel facilities within Stone Lakes NWR boundary must be considered. We continue to be concerned about the potential placement of the forebay, pumping facilities and, particularly, transmission lines within the legislative boundary of the Stone Lakes NWR. (See 57 Fed.Reg. 33007 (July 24, 1992).) It is the longstanding goal of the Fish and Wildlife Service and Refuge supporters to acquire and restore habitat within the entire boundary. The proposed conveyance facilities within the boundary would interfere with the ability of the Fish and Wildlife Service to implement its goals for the Refuge, as described in the Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan. The EIR must identify and evaluate the potential impact of the project on realizing these goals and plans, and mitigate accordingly. Please see attached map of Stone Lakes NWR.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor Issue Summary: Wetlands Impacts: Besides reasons already stated, the destruction of wetlands for the construction and operation of project facilities appears to be a significant impact. A shaft on Staten Island, which is a large bird preserve seems unimaginable. In fact, the entire route with its noise and air pollution is the antithesis of preserving wetlands.
747	Jan McCleery Save the California Delta Alliance	Eastern Corridor Issue Summary: Wetlands Impacts: Since it goes through Delta islands, there is still destruction of wetlands.

752	Amber McDowell Double M Farms	Habitat disruption. Even small changes of the area for just a year can cause detrimental impacts for the Greater Sandhill Cranes. According to the Conservation Assessment For Greater Sandhill Cranes Wintering On The Cosumnes River Floodplain And Delta Regions Of California Report, "Cranes show a high degree of philopatry to traditional wintering sites, and do not readily shift to new areas." They recommend that construction should only occur outside of the wintering period. They also state, "The San Joaquin-Sacramento Delta is one of the two most important winter use-areas for the Central Valley Population of Greater Sandhill Cranes, for over 61% have been recorded on the Delta. The most important islands and tracts include Staten Island, Brack Tract (including Woodbridge ER), the remaining suitable croplands on Terminous Tract (particularly the north and east portions), Canal Ranch, and the New Hope Tract south of Walnut Grove Road. We consider these areas critical to the conservation of Greater Sandhill Cranes, as they support the most consistently used roosting and feeding sites on the Delta; therefore, they should receive the highest priority in conservation plans." The Delta Conveyance Project proposes to go through many of these areas. I request the EIR address ecological impacts on migratory species, especially the Greater Sandhill Cranes.
791	Arabella Merlo	Brack Tract is known for the Woodbridge Ecological Reserve, home to Sandhill Cranes, Tundra Swans and other birds. This Reserve (according to the California Department of Fish and Wildlife) provides the largest area of freshwater marsh wintering habitat in the State, not only for Sandhill Cranes, but for other waterfowl as well. Many birds use the reserve as their fall and Winter home, Local residential birds include the red-Wing blackbird, black-Shouldered kite, American Kestrel, ring-neck pheasant, meadow larks and other small song birds. As President of a local chapter of the National Audubon Society stated at a Scoping Public Hearing, new habitats would have to be established prior to construction and surveys over several years would be needed as birds often return to their same place of birth habitat to breed.
800	Joshua Grover California Department of Fish and Wildlife	The following key components should be considered by DWR during the development of an EIR: Design features and measures to ensure that no take of fully protected species, including the greater sandhill crane, occurs as a result of Project construction and operation.
853	Susan Alexander	The EIR must analyze the tunnel's cumulative impacts, with particular focus on biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Impact to wetlands.
955	Donna Bramble	Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
956	Betty Miller	Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
959	Sandra Hagerty	Finally, the long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife.
973	Laurie Yglesia	- Impact to wetlands.

905, 906	Mark & Linda Lambert	5). Impact on wetlands.
999	Tara Beeman	What will 10-15 years of construction do to the Stone Lakes National Wildlife Refuge? With urban sprawl increasingly covering up the world famous fertile farm lands of the Sacramento and San Joaquin Valleys, the farms that used to provide wildlife habitat being covered up by houses and roads and shopping malls, where is the wildlife supposed to go if we also disturb and destroy remaining habitat for the thousands of birds, mammals and plants that live in that area?
1005	Stacy Sebring	What will be the impact on frogs, turtles, beavers, otter, blue heron, osprey, trout, suckerfish?

Table D-24. Comments Regarding Land Use

Letter	Commenter Name, Affiliation	Comment Text
24	William Burke County of Sacramento	The NOP previews elements of the Project during both the construction and operational phases that are inconsistent with or would require approvals pursuant to the County Zoning Code. Most of the land area proposed for construction and development of the Project is zoned for agricultural, open space or public uses. The construction of access roads, barge unloading facilities, concrete batch plants, fuel stations and mitigation areas conflict with the prevailing land uses in that area and would require conditional use permits, special development permits, variances, rezones, Code text amendments, and/or master plan amendments.
24	William Burke County of Sacramento	The proposed reusable tunnel material ("RTM") piles are also inconsistent with existing zoning designations in the Delta portion of the County. The Draft EIR must acknowledge these land use conflicts and recognize the role of the COUNTY in considering the appropriateness of such uses or their proposed location.
24	William Burke County of Sacramento	COUNTY'S Grading Ordinance establishes a discretionary process for permitting activities that would "(1) grade, fill, excavate, store or dispose of 350 cubic yards or more of soil or earthly material; or (2) clear and grub one acre or greater of land ... " (Sac. County Code,§ 16.44.050.) Presumably, the Project's RTM piles will exceed this threshold standard. The Draft EIR must acknowledge the applicability of the COUNTY Grading Ordinance and address how the Project will mitigate the various impacts resulting from placement of RTM, including conversion of agricultural land, drainage, erosion and sedimentation, and visual impacts. The DEIR must further explain how DCA intends to comply with the grading standards of County Code Chapter 16.44.
48	Libby Lucas	Request you also address these specific areas of concern: - degradation of adjacent island river bank levees which may jeopardize sustainability of subsided island habitation and farms
48	Libby Lucas	Request you also address these specific areas of concern: - what mitigation is proposed to insure against severity of impact to already subsided island terrain from tunnel construction
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. DWR must perform a real, detailed and scientific cost/benefit analysis that reflects all the costs, real and hidden, of the project, including fiscal impact to the farmers and residents in the construction zone and along the two tunnel routes. The economic loss of productive agricultural land to the state as a whole must be quantified.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	The Sacramento-San Joaquin Delta is a unique place critical to the economy of California. We cannot take the chance that this special place of rivers, sloughs, wetlands and islands will be damaged or destroyed by sending water south to areas that are essentially deserts. There are crops that are suitable to those areas, but high water use crops are not. It is the responsibility of the State of California and the Department of Water Resources in particular too protect and sustain the richest agricultural and recreational area in the state.

558	Edward Schnee	The long term effects of removing water north of the Delta instead of allowing it to flow through the Delta will be hugely problematic to the environment and wildlife. We already suffer from algal blooms due to low flowrates that will worsen if water is removed before flowing through the Delta.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Analyze the impacts on the zoning and land uses authorized by law on the parcels where the Residents, each of the Residents, are located, including complete description and analysis of all land use conflicts and mitigation for each land use conflict.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, the Project will cause blight and property abandonment in the Clarksburg Community, each significant part of the Clarksburg Community, and North Delta.
623	Bob and Carolyn Graham	Delta farmers will have their livelihoods negatively affected.
624	Gabrielle Tetreault	Delta farmers will have their livelihoods negatively affected.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	Likewise, DWR must address how its Project conflicts with local land use plans, and work to remedy and avoid these conflicts.
704	Eric Jenks Wilbur-Ellis Company	Some of the most agriculturally productive areas of California are in the Delta region, where the Delta Conveyance Project is proposed. As discussed above, growers in the Delta region (as well as northern San Joaquin and southern Sacramento counties) rely on the Twin Cities facility for fertilizer, crop protection products, seeds, and agricultural implements and equipment. Location and proximity are especially important for agricultural products because of their size and nature—e.g., large volumes of fertilizer, heavy and bulky equipment—which are not well-suited for transport across long distances. The Twin Cities facility is the largest and most centrally located agricultural retail facility in the Delta region. Closure or disruption would have serious impacts on agriculture in the region—not just impacts to a single farm, but to hundreds of farming customers (313 customers served in 2019) that use products or services from the Twin Cities facility. Furthermore, agricultural impacts, including impacts from any disruption of the Twin Cities facility, should be analyzed on both a Project-specific and cumulative basis. In addition, the EIR should consider and analyze any potential impacts related to conversion of agricultural land and/or land use incompatibility associated with the possible need to relocate—temporarily or permanently—the Twin Cities facility.

729	Erik Vink Delta Protection Commission	Delta Land Use is Controlled Carefully to Foster Agriculture, Encourage Tourism and Recreation, and Maintain Legacy Communities. The Sacramento-San Joaquin Delta is vast, encompassing nearly three-quarters of a million acres of land and 700 linear miles of waterways. Its land uses generally reflect the settlement patterns of the past century and a half, closely associated with its rivers, sloughs, and waterways, and with the configuration of agricultural lands. Rural communities reflect the diverse heritage of the Delta, serving as social and service centers for the surrounding farms and historically served as shipping sites for products. In response to rapidly encroaching urban growth the Legislature enacted the Delta Protection Act of 1992 (Public Resources Code29760 et seq.), establishing the Delta Protection Commission and dividing the legal Delta into a primary zone and a secondary zone, with the Commission's principal land use authority over the primary zone. The Act requires the Commission to prepare and update a comprehensive Land Use and Resource Management Plan guiding land uses within the primary zone. The primary zone is largely rural and not intended for intense development. The secondary zone includes existing cities and areas that may be developed. The "legacy communities," eleven communities largely in the primary zone –Clarksburg, Courtland, Freeport, Hood, Locke, Walnut Grove, Ryde, Isleton, Rio Vista, Knightsen, and Bethel Island, --are a focus of economic development activities and cultural heritage. Key elements of the Commission's and counties' land use approach are to preserve the rural lands for agriculture and agricultural-related businesses, allow for rural, farm-friendly visitor-serving facilities such as wineries and event facilities, marinas and resorts in key locations to support tourism, and protect the legacy communities as retail and residential centers to support agriculture and tourism. This approach includes some flexibility by allowing unique uses, such as agricultural sales or childcare facilities, by special permits. The proposed tunnel is incompatible with this fundamental strategy, both during the long construction period and during operation. Presentations at the Stakeholder Engagement Committee (SEC) meetings convened by the DCA showing the location and intensity of construction impacts on traffic, for example, have illustrated how the effect on the Delta as a whole –as a place –is analogous to an earthquake with a series of major aftershocks. Not all Delta communities will be affected in the same way, or perhaps with the same intensity, but all will be affected. Intake facilities on the Sacramento River as described in the NOP, regardless of which are selected, and regardless which corridor alignment is selected, would irreparably damage the communities of Clarksburg in Yolo County, and Hood and Courtland in Sacramento County. In San Joaquin County, launch shafts, tunnel material handling, and maintenance and retrieval shafts will convert farmland and disrupt marinas and recreational boating. Contra Costa county communities such as Discovery Bay would suffer major recreation impacts. In Solano County, the economic and cultural impact of required project mitigations from agricultural lands being converted to restoration projects are a major concern, as are water quality impacts on municipal wells for Rio Vista and agricultural users in the Cache Slough region.

729	Erik Vink Delta Protection Commission	Every Element of the Project Disrupts Existing and Planned Land Use. Tunnel construction would fundamentally change the agricultural-and water-based character of Delta communities and landscape because of the duration and sheer number of different locations that construction and staging would take place. The use of nearly 8,000 acres of land will be changed due to surface impacts, with another several thousand acres of agricultural lands likely converted for habitat mitigation. Construction of the tunnel launch, retrieval/reception and maintenance shafts, the intermediate and new southern forebays, pumping plant, and construction-support facilities along the alignment including access and haul roads, potential additional rail lines, barge unloading facilities, concrete batch plants, fuel stations, mitigation areas, and power transmission and/or distribution lines will alter the landscape for the better part of two decades, based on the construction methodology currently being presented by the DCA. Use of additional areas will be harmed by noise, traffic congestion, impaired recreation and tourism, damaged scenery, other disruption accompanying construction, degraded quality of life, lowered property values, and lost investment.
729	Erik Vink Delta Protection Commission	Intake and Tunnel Construction. Construction of two intakes for either alignment shown in the NOP, each occupying at least 200 acres, would result in drastic changes to the communities of Clarksburg, Hood and Courtland, as well as neighboring areas and the Stone Lakes National Wildlife Refuge. Road construction and widening, bridge modifications and interchange improvements, and installation and operation of concrete batch plants would virtually all occur within the primary zone, in direct conflict with the most fundamental principles of the land use approach of the Delta Protection Act and the Commission's Land Use and Resource Management Plan. After construction is completed, pressure will grow for non-farm development at areas adjoining new off-ramps or sites that cannot be returned to agriculture.

729	Erik Vink Delta Protection Commission	Tunnel Corridors. Extending beyond the intakes, construction and operation of the "Central Tunnel Corridor," which would also necessitate widening of narrow bridges and extension of existing or creation of new access and haul roads through much of the agricultural land of the primary zone, would literally pave the way for transformation of the regional landscape, setting a precedent of devalued baseline conditions. Two to three launch shafts for launching the tunnel boring machines (TBMs) would be required along either tunnel corridor alignment shown in the NOP. Likely launch shaft locations are at Granville Tract adjacent to Interstate 5 at Twin Cities Road, at Lower Roberts Island near the San Joaquin River channel, and at Byron near the Clifton Court Forebay and proposed new southern forebay. Another potential launch site for an "Eastern Tunnel Corridor" would be at Rough and Ready Island near the Port of Stockton. According to the SEC presentations, current thinking is that four TBMs would be used, and would potentially tunnel in both north-south directions. Each launch shaft site would be 200-300 acres. The size and complexity of the launch shafts sites are significant: at these sites, the TBM is launched, followed by the tunnel liner sections, and the tunnel material is removed. Once removed, tunnel material must be dewatered, currently proposed to be onsite with large levees surrounding a tunnel material storage and consolidation center. Liner sections for the proposed 40-foot diameter tunnel would potentially be fabricated at existing nearby plants in Stockton, Lathrop, Antioch and Rio Vista. Transport of liner sections onsite and tunnel material offsite is being considered by barge, rail, and/or truck, although barge and/or rail are being prioritized. A range of operational conditions for the tunnel is possible, but among the examples given at the SEC meetings for a 6,000 cubic feet per second (cfs)tunnel capacity would be that 50 liner segments per day would require 25 days of truck hauling versus 3 to 5 days by rail or barge. Likewise, estimates for removal of tunnel material offsite range widely, but are staggering. The launch sites would include construction offices, concrete batch plants, equipment storage and electrical substations. In addition to the launch sites, potentially up to 10 maintenance and retrieval (or reception) shafts will be required for either alignment shown in the NOP. At 15 to 20 acres per shaft site, this represents another 200 acres minimum of converted farmland. It would be disingenuous for the draft EIR to characterize any of the land conversion along the tunnel alignment as temporary, since even construction sites that are not permanently part of operations will be fallow so many years and will be affected by soil modifiers and other effects from the use of the property as to be of questionable agricultural value if they are ever decommissioned and reclaimed for agricultural use. However, most if not all facilities may well be left in place, according to presentations at the SEC, increasing pressure for non-farm use at sites that cannot be returned to agriculture.
729	Erik Vink Delta Protection Commission	Habitat Mitigation. Further changes to existing land uses can be anticipated from habitat restoration likely to be proposed to mitigate damage to biological resources. For example, the BDCP/WaterFix EIR proposed converting thousands of acres of farmland to marsh or riparian woodland.

729	Erik Vink Delta Protection Commission	Recommended Significant Adverse Impacts Analysis and Method of Documentation: Given the foregoing brief description of just some of the potential land use impacts, it is clear that tunnel construction and operation in any alignment will irrevocably alter the rural character of the Delta, adversely impacting its economic pillars (agriculture and recreation), and its cultural heritage. The project seriously threatens the long-term sustainability of the Delta regional economy, which the Commission is charged with enhancing and promoting. In addition to direct land use conflicts, in many areas the project would cause a substantial change in intensity of land use that would be incompatible with adjacent land and water uses. The basic livability of Delta legacy communities and Discovery Bay would be compromised by increased noise and congestion and reduced quality of life. Property values and affordable housing have already been severely impacted over the past decade, buffeted by the economic downturn, by high flood insurance costs and stringent construction requirements, and by the threat of construction of BDCP/CA WaterFix, the predecessors to the current single tunnel proposal. The challenges of housing project construction workers will likely mean competition for local housing resources, which will make it more challenging for major Delta businesses such as marinas and agricultural support to house their workers. The project would cause enormous disruption of the basic elements of daily life for Delta residents, including functional access to schools, libraries, churches, medical care, elder and childcare, and shopping. Existing congestion on Highways 4, 12, and 160 already impairs Delta residents' commutes to jobs within the Delta and beyond to the metropolitan areas of the East Bay, Stockton-Tracy, and Sacramento, often literally grinding to a standstill. Accidents are frequent and too often fatal, especially on Highway 160 and Twin Cities Road. Delta farmers' ability to move slow or over-size equipment safely from one location to another is already challenged. At least two dozen bridges on the Sacramento, Mokelumne, and Middle rivers and multiple sloughs would be affected by increased barge, rail and truck transit. Either of the alignments of the proposed project shown in the NOP would exacerbate these existing transportation challenges. New rail spurs or access and haul roads could also interfere with access to farmland. Damage to landside recreation and tourism would occur both directly and indirectly through noise and disruption of the aesthetic charm and character of key tourist destinations such as Hood, Courtland, Clarksburg, Locke, Walnut Grove and seasonal and permanent farm stands along the scenic Highway 160 as well as wildlife viewing destinations such as Stone Lakes National Wildlife Refuge(NWR), Cosumnes River Preserve, Staten Island, and numerous San Joaquin County sandhill crane and waterfowl roosting sites. Recreational boating would be significantly impacted –and in some cases facilities eliminated –on the Sacramento, Mokelumne and San Joaquin Rivers and the south Delta and at marinas, launches, popular anchorages and hangouts such as Lost Slough and the Meadows; Wimpy's; Giusti's; Beaver, Hog and Sycamore Sloughs; Tower Park; King Island; Potato Slough; Mildred Island and Horseshoe Bend; Bullfrog Landing and Lazy M, to name just a few. Effects could include partial property acquisitions, resulting in division of agricultural or residential parcels, which could create non-conforming lot sizes that are inconsistent with counties' land use and zoning designations. To meaningfully convey these effects for Delta communities and decision-makers, the EIR should tabulate the acreage and map the areas affected by every adverse or incompatible feature of the project, including direct land use conversions, noise in

	excess of standards for existing or proposed land use, properties where road congestion to level D or worse impairs access, harm to landscapes surrounding visitor destinations, or other project-related damage. The acreage of lands harmed, by land use (e.g., agriculture, residential, etc.), should be tallied, as should the number of impacted homes and businesses. To adequately inform business owners, their employees, and residents, the EIR should list the names of businesses and the addresses of homes likely to be impacted, much as the EIR lists the species found in habitat areas affected by the project. Special uses that contribute to community cohesion should be highlighted, including groceries, post offices, schools, churches, libraries, and community centers. To assess impacts on affordable housing, typical rents of homes adversely affected by the project should be estimated. In addition, given the tight housing markets in the affected areas, construction workers' demand for housing should be carefully forecast, considering the project's labor requirements, existing capacity of necessary skilled labor in the region, and the current and forecast utilization of construction workers residing in the region. A thorough analysis of housing impacts should replace the BDCP/WaterFix EIR's assumption that the preponderance of project workers will already reside in the region, particularly given the current state housing mandates that local governments are struggling to meet.

729	Erik Vink Delta Protection Commission	Recommended Approach to Developing and Evaluating Mitigation Measures: In preparing the draft EIR, DWR should provide mitigation that adequately addresses the nature of impacts on land use and communities. At a minimum, the EIR should incorporate the applicable land use policies, standards and Best Management Practices (BMPs) in the applicable local government's general plan and zoning ordinance and adopt the mitigations recommended in Delta Plan recommendation WR R12(b)(2)(I)) and the Delta Plan Mitigation, Monitoring and Reporting Program (MMRP). Mitigation measures for land use and all other environmental aspects of the project should be structured to use careful phasing of project construction to minimize disruption, including cumulative disruptions simultaneously affecting multiple areas of the Delta. Because the duration of the project contributes to its damage to Delta land use, measures should be proposed that provide incentives for timely project completion penalties for deviations from agreed-upon schedules, without increasing short-term impacts. To mitigate impacts to affordable housing, replacement housing for acquired or impaired homes should be provided as required by the Delta Plan MMRP. Any home that may be acquired should be carefully maintained and, at the end of the construction period, rehabilitated as needed and sold at affordable prices to prior or new occupants. Contributions to support development of new affordable and work-force housing, including farm labor housing, should also be considered, as were provided in the LAX (Los Angeles International Airport) master plan1. The text below identifies other measures that should be proposed to reduce harm to specific land uses, such as agriculture and tourism, or mitigate specific impacts that affect land use, such as noise or traffic congestion. Wherever feasible, mitigation measures should support or enhance existing Delta land use. For example, could the project's greenhouse gas (GHG) emissions be offset by a fair-share contribution that covers the capital costs faced by Delta agricultural land owners who wish to grow rice or other crops that sequester carbon and reverse land subsidence, including costs for land preparation (e.g., land leveling and water management features such as checks and ditches)?The Sacramento-San Joaquin Delta Conservancy has identified these costs as a significant barrier to carbon-sequestering farming systems in the Delta. Involve Local Agencies, Businesses and Residents. Delta agencies and affected residents should be consulted as these mitigation measures are developed, evaluated, and implemented. Now is the time for DWR to engage in serious conversations with Delta counties, other local agencies, the Commission, and the Sacramento-San Joaquin Delta Conservancy, as well as other state agencies such as Caltrans and the Department of Parks and Recreation about effective mitigation measures. For example, DWR should propose an adaptive strategy for monitoring project effects on Delta land use, residents, and businesses, monitoring outcomes and responding to unanticipated impacts. The mitigation strategy used by the High Speed Rail project to address traffic impacts on agricultural land use could be evaluated in consultation with affected Delta property owners to assess the effectiveness of providing crossings or alternate routes that can accommodate farm equipment, allowing continued use of agricultural lands and facilities. The EIR should also propose mitigation measures to reduce economic blight and other cumulative impacts on Delta land use, as major public works projects throughout the state or elsewhere have done. One example is the Business Interruption Fund used to mitigate effects of Los Angeles' Metro subway. The fund should provide quickly accessible funds to offset the loss of business

		income or other damage to land uses due to construction impacts. It could also fund expansion and implementation of the Commission's Delta Community Action Planning effort, invest in public facilities that can compensate for damage to Delta communities and infrastructure through the Delta Investment Fund (PRC section 29778.5), or support agricultural, cultural, recreational, and tourism programs and projects through a Delta charitable entity such as the Delta Regional Foundation. The Commission's Economic Sustainability Plan (ESP) and the Delta Plan propose numerous recommendations in support of Delta as an evolving Place. DWR should consult with Sacramento Area Council of Governments (SACOG), San Joaquin Council of Governments (SJCOG), and Association of Bay Area Governments (ABAG)to assess whether the Mega-Region Economic Model they are developing could be helpful in understanding the project's population, housing, and employment impacts in the Delta and could contribute to developing a strategy to compensate for economic damage from the project.
731	Mark Pruner Clarksburg Fire Protection District	EIR must fully analyze the impacts on the zoning and land uses authorized by law on the parcels where the Fire District property is located, including all land use conflicts and mitigation for each.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	EIR must fully analyze the impacts on the zoning and land uses authorized by law on the parcels where the Old Schoolhouse is located, including all land use conflicts and mitigation for each.
740	Ryan Hernandez Contra Costa County Water Agency	The EIR should analyze Impacts to the planned development of commercial solar facilities within eastern Contra Costa County and the project area.
746	Friends of Stone Lakes National Wildlife Refuge	Instead of showing the boundary approved by Congress, maps by DWR and the DCA appear to only show the areas of Stone Lakes NWR that are already in public ownership. Maps in the Draft EIR that show the location of refuges, preserves and habitat conservation plan areas in the document must show the Stone Lakes NWR legislative boundary, not just lands in fee or easement ownership. All lands within the Refuge boundary may be managed to carry out the approved purposes of the Refuge, and thus could be potentially bought for public ownership. Encroachments, development and disturbances within the Refuge boundary undermine Congressionally approved directives as well as the ability to carry out the Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan. Permanent conversion of land within the Refuge's legal boundary by the project prevent the future use of Refuge lands for wildlife conservation. All analysis of impacts on the Refuge must begin with a correct boundary, not a truncated partial map.

789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy DP P1 (Cal. Code Regs., tit. 23, § 5010) requires that new residential, commercial and industrial development be restricted to areas described in Delta Plan appendices 6 and 7. The NOP does not describe residential, commercial or industrial development as part of the Project, but does describe ancillary features that could be constructed. The EIR should analyze the Project's potential to create both temporary and permanent residential, commercial, and industrial development in applicable areas and describe the resulting potential impacts.
789	Jeff Henderson Delta Stewardship Council	Delta Plan Policy DP P2 (Cal. Code Regs., tit. 23, § 5011) requires the siting of project improvements/facilities to avoid or reduce conflicts with existing or planned future land uses when feasible. DP P2 may also apply if mitigation habitat is required within the Delta. Independent from state law related to local land use authority and CEQA requirements, DP P2 is a directive to state and local public agencies proposing covered actions, and it specifically requires water management facilities, ecosystem restoration projects, and flood management infrastructure to be sited to avoid or reduce conflicts with existing uses or those uses described or depicted in city and county general plans for their jurisdictions or spheres of influence when feasible, considering comments from local agencies and the Delta Protection Commission. DP P2 considers a range of effects that extend beyond CEQA requirements. The EIR should describe the project process to avoid or reduce conflicts with existing or planned future land uses. This is a wide-ranging policy relevant to many resource areas in the Delta. Given the importance of agricultural land use, presence of Legacy towns, and the unique culture and history of the region, DWR should include in the EIR detailed analyses of potential impacts as well as documentation of how existing and planned land uses would be protected, or how potential conflicts with planned land uses would be mitigated, when feasible.
789	Jeff Henderson Delta Stewardship Council	Based on the record for California WaterFix, similarity of the proposed central tunnel alignment, and ongoing discussions with the SEC, the following issues should receive particular focus in the EIR to demonstrate that DWR has avoided or reduced underlying conflicts with existing or planned Delta land uses when feasible: Potential conflicts with local land use plans Potential conflicts with existing Delta communities Potential conflicts with existing Delta parks and recreation uses Potential conflicts with existing agricultural lands Potential conflicts with community land uses or economic conditions in legacy Delta communities that rely on agriculture Potential conflicts with existing land uses due to Cultural and historical resource impacts Traffic impacts Noise and vibration impacts Visual and aesthetic resource impacts Public health and hazards impacts Wastewater discharge facility impacts
789	Jeff Henderson Delta Stewardship Council	As described in the NOP, the Project does not appear to involve residential development in rural areas. If such development is proposed, the EIR should analyze and describe such development.

Table D-25. Comments Regarding Agriculture

Letter	Commenter Name, Affiliation	Comment Text
87	Jaclyn Shaw	(5) DUST BOWL to empty tunnel? Five years ago, our WID district manager told me that Lodi would become a Dust Bowl unless growers go to more state water board meetings. What about community health with more construction nuisance?
87	Jaclyn Shaw	8) More Signs? VISIT DELTA COUNTIES! Food tasting tours… More people need to visit Grand Mansion and Lodi wineries. Before, the 1929 Pardee Dam, Lodi raised watermelons without irrigation. Now, some cater to growing "weed" or indistinguishable hemp. Lodi wines were proclaimed #1 in the world (Wine Enthusiast, 2015). It has been of largest three school district areas in the state, including Terminous and historic other towns. What about all the marinas for good health in local water recreation?
87	Jaclyn Shaw	(9) More Signs: WELCOME to San Joaquin County, FRESH FOOD, for now? Since we have interstate five, from San Diego to Portland, can we have freeway signs: Welcome to Lodi wine history. Welcome to San Joaquin County, 2/3 the Delta and home of almost 200 kinds of food crops, healthy fruits, nuts, veggies and more!
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. Loss of rich and productive agricultural land to benefit huge agribusiness farmers in what is essentially a desert. The agricultural land in the Delta will be permanently damaged not only by the construction and operation of the tunnel but by all the associated building that will accompany it on a permanent basis. The acreage that will be temporarily taken out of production can probably never be replaced; that part of the Delta is mainly in vines and trees. Many farmers will potentially not be able to survive the loss of productive land even during the construction process. Some of the land will be permanently out of production. An economic estimate of this potential loss must be included.
225	Kim Thai East Bay Regional Park District	The EIR for the Delta Conveyance Project will need to consider the project's impacts to existing and planned EBRPD park and trail facilities.
248	Tom Williams	Provide review and assessment of secondary, growth induced impacts with expansion/changes of annual and perennial land uses, both agricultural and structured.
341	Dante Nomellini, Sr. Central Delta Water Agency	Our farming and the traffic is going to be terrible.
348	Jack Saunders	What we know is there is some land that's going to be taken out of farming, and but they're still going to get the same amount of water. So what is going to happen is a great deal for them. They're going to be able to sell it at market price, and we're going to be subsidizing all of that.

374	Tim Neuharth Steamboat Acres	Concerned about impacts to agriculture.
435	Russel van Loben Sels	In the past, it was suggested that an 21 undefined Agricultural Land Stewardship plan, an ALSP, 22 might be created to mitigate for some of the negative 23 impacts to agricultural resources. 24 In the past, an ALSP has been discretionary, 25 undefined, unfunded, and not enforceable and, therefore, 1 should not be used as mitigation for negative impacts 2 for agricultural resources.
515	Lisa Combs	Farmers crops are going to have salt water which is, in my eyes, our crops are everything. This is part of the Delta and part of our agriculture. What is that cow going to be drinking? It a trickle effect. What is our corn going to be like?
519	Mike McCleery	What happens to the 500,000 acres of fertile farmland here in the Delta, peak soil, that relies on water siphoned out of the sloughs? If this tunnel goes through, what's going to happen to the Delta?
519	Mike McCleery	We are going to be impacted by loss of farming.
523	Kristen Olner	Consider agricultural interests.
558	Edward Schnee	Delta farmers will also have their livelihoods negatively affected.
559	Rev. Dr. Richard Stinson Livingston United Methodist Church	I am concerned about the negative effect on small farmers.
610	Henry Kuechler Reclamation District No. 2060	Analyze significant impacts to productive agricultural lands and communities in the Delta.
612	Warren Bogle Reclamation District 150	Analyze significant impacts to productive agricultural lands and communities in the Delta.
623	Bob and Carolyn Graham	Gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
624	Gabrielle Tetreault	Gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
637	Osha Meserve Local Agencies of the North Delta	Unlike the EIR for the CWF, this project's Draft EIR must clearly disclose the total acreage of agricultural land that would be permanently converted to other uses as a result of the project. The amount of agricultural land would be subject to indirect impacts from project construction and operation must also be disclosed. Such an analysis requires a complete and detailed project description, along with accurate baseline information regarding cropping, irrigation and harvesting practices, among other factors.

637	Osha Meserve Local Agencies of the North Delta	In addition, impacts to surface water quality that reduce agricultural productivity must also be disclosed. Extensive comments and testimony have been prepared regarding these issues. Thousands of senior water rights holders rely on high quality water supplies in the north Delta to produce crops. Any denigration of this water quality must be analyzed and disclosed. Compliance with Water Quality Control Plan standards (for which there may not be specific compliance points in the north Delta) is inadequate from a CEQA perspective. In addition, farmers irrigate in real time, not over two-week averages. The Draft EIR should assume that farmers will rely on surface water diversions every day of the growing season, and analyze the effects of both short and long term increases in salinity on agricultural productivity and soil health.
704	Eric Jenks Wilbur-Ellis Company	If a launch site or other Project component near the Twin Cities facility is included in the proposed Project, the EIR should (a) should fully analyze the environmental and related impacts of such Project component, including impacts to agricultural resources.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Tunnel shafts. The project states it will require a series of launch and retrieval shafts with each shaft requiring 400 acres for construction staging and material storage and a permanent footprint of 4 acres that will be 45 feet tall. These shafts would be placed every 4-5 miles along the tunnel route totaling at least 7 shafts for the Central Corridor Site Plan and 9 for the Eastern Corridor Site Plan. This height would put each shaft well above the levee height and in sight for miles around in the Delta. These unsightly pillars will ruin the aesthetic natural beauty of the Delta, hinder the agricultural productivity of those farmers located along the tunnel track during construction, and permanently disable their land to farm after construction. In addition, the project plans to develop and build new "haul roads" for their construction equipment to get to these shafts and between shafts furthering the disruption and damage to agricultural production. The EIR needs to address and mitigate for the financial loss of agricultural production at each of these sites.
715	Daniel Wilson Reclamation District 3	Analyze significant impacts to productive agricultural lands and communities in the Delta.
718	David Strecker San Joaquin Farm Bureau Federation	Tunnel shafts. The project states it will require a series of launch and retrieval shafts with each shaft requiring 400 acres for construction staging and material storage and a permanent footprint of 4 acres that will be 45 feet tall. These shafts would be placed every 4-5 miles along the tunnel route totaling at least 7 shafts for the Central Corridor Site Plan and 9 for the Eastern Corridor Site Plan. This height would put each shaft well above the levee height and in sight for miles around in the Delta. These unsightly pillars will ruin the aesthetic natural beauty of the Delta, hinder the agricultural productivity of those farmers located along the tunnel track during construction, and permanently disable their land to farm after construction. In addition, the project plans to develop and build new "haul roads" for their construction equipment to get to these shafts and between shafts furthering the disruption and damage to agricultural production. The EIR needs to address and mitigate for the financial loss of agricultural production at each of these sites.

729	Erik Vink Delta Protection Commission	Protect agriculture. Agriculture is the Delta's principal land use, the foundation of its rural economy, and a pillar of its culture. Every effort to protect it should be taken. Project actions, including wildlife, fish, and habitat mitigation measures, that will directly or indirectly affect agriculture should be described. These should be based on the most recent information about Delta farms, including information we have gathered to update the ESP. Estimates of farmland lost for project facilities, tunnel material management and storage, and wildlife, fish, and habitat mitigation should be reported by total acres, acres by crop type, acres by soil type, and acres under Williamson Act contract. Impacts to local irrigation, drainage, and flood control facilities should be considered, as should loss or impairments of crop processing facilities, such as packing sheds and wineries, project-related congestion on farm-to-market roads, and farm labor housing. Selection of tunnel material, management sites, habitat restoration areas, and other facilities should place a high priority on avoiding prime farmland.
729	Erik Vink Delta Protection Commission	Fully describe avoidance and mitigation actions now. Actions taken to avoid and mitigate impacts to farmland should be described in the EIR, rather than deferred to some future date after the project has been approved, as was proposed in the BDCP/WaterFix EIR. Affected farmers, Delta county Farm Bureaus, county agricultural commissioners, U. C. Cooperative Extension agents, the California Department of Food and Agriculture, and other agricultural interests and experts should be involved in discussions to develop these measures. The menu of potential actions outlined in the BDCP/WaterFix EIR's agricultural land stewardship plans is one good source of mitigation options, but the EIR needs to describe now how these would be applied to specific areas along the project right-of way. DWR should propose a model good neighbor agreement to farmers operating on or adjoining its proposed right-of-way, into which these measures could be incorporated as appropriate, including a process to resolve disputes and compensate for farm income losses. Where specific impact areas cannot yet be described, such as some restoration areas to compensate for habitat damage, the EIR should include clear standards or triggers that explain the extent of mitigation, how its adequacy will be determined, and how those affected will be involved in its development. At a minimum, these measures must comply with or be equivalent to those of the Delta Plan's MMRP sections 7-1 to 7-4. These restoration projects should be subject to subsequent CEQA review.

729	Erik Vink Delta Protection Commission	Avoid and reduce tunnel material impacts. Much of the permanent impact to agriculture reported in the BDCP/WaterFix EIR was for management and storage of tunnel material. In addition to avoiding prime farmland when locating tunnel material facilities, further measures to reduce impacts of these facilities should be employed. Soil conditioners used in creating tunnel material management areas should be selected carefully so that disturbed areas can be returned to agricultural use after the project is completed. Measures to recover compacted soils at these sites should be proposed. A specific plan for reusing tunnel material must be developed, beginning with review of the feasibility of reuse. A review of spoils disposed from navigation and flood control channel dredging throughout the Delta and Sacramento Valley shows that little has been reused even decades after it was disposed, either because it was unsuitable for other uses or because local users could not afford trucking and other costs required to reuse it. The results of DWR's soil boring investigations should enable classification of the potential uses of excavated material. If feasible, excavated tunnel material should be handled and stored in ways that segregate materials of different quality so they can more easily be reused. Material suitable for reuse to maintain or improve levees should be hauled to those reclamation districts that want it. Costs of hauling tunnel material to reuse sites should be borne by the project, rather than by those who may reuse it, as this mitigation measure is properly a cost of the project's contractors pursuant to Water Code section 85089.

729	Erik Vink Delta Protection Commission	Use conservation easements to compensate for cumulative farmland losses. DWR, through its habitat restoration actions, is the biggest source of farmland loss in the primary zone of the Delta. These actions include both habitat projects at Dutch Slough and McCormack-Williamson Tract and SWP mitigation projects, such as the Lookout Slough tidal marsh restoration project. Farmland lost to this project, even if project features are sited and operated to reduce impacts, will likely add thousands more acres to this accumulating toll. This continual re-purposing of the land underlying the Delta's core activity is unacceptable. Site specific measures to avoid or reduce impacts on farmland can reduce local impacts, but the purchase of conservation easements over Delta farmland that would otherwise be threatened by development can compensate for unavoidable cumulative losses. Farmland conservation easements are part of the High Speed Rail project's agricultural mitigation program3. DWR has agreed to obtain them to partially mitigate the effects of the Lookout Slough tidal marsh restoration project. The Delta Plan's MMRP requires such compensatory mitigation at a ratio of 1 acre protected for each acre permanently damaged. Most Delta local governments require higher mitigation ratios. Rural farmland in the Delta's primary zone is already secure from development under the provisions of the Delta Protection Act, so the purchase of conservation easements should target areas as buffers in the Delta's secondary zone or areas immediately adjoining the Delta where long-term development pressure is higher. Areas proposed to be secured for sandhill crane habitat or other wildlife-friendly farming should not be considered as compensating for the project's contribution to cumulative farmland losses, since agricultural uses of those lands will be constrained, not unreservedly preserved, by those wildlife-friendly practices and because those lands will be protected in any case. The assertion that securing such agricultural conservation easements may be infeasible is not supported by any evidence. Successful farmland conservancies operate in each Delta county and our own assessment shows that, during the decade before approval of the WaterFix project, they and other agencies secured conservation easements in and adjoining the Delta primary zone in excess of the acreage of conservation easements that would have been required to compensate for that project's permanent destruction of farmland. This indicates that acquiring a similar acreage during this project's construction period should also be feasible. It is understandable that Delta farmers directly affected by this project may be reluctant to cooperate with DWR, but a creative partnership with the California Department of Conservation may make a program of purchasing conservation easements more feasible. Finally, business losses by Delta farmers and agricultural businesses should be eligible for compensation through a business interruption fund, as described under the land use section above. A contribution to the Delta Investment Fund could help compensate for other economic losses to the Delta's agricultural economy.
730	Reclamation District 551	Where pumping operations, seepage, or dewatering activities raise existing salinity levels on these farms, the landowners may experience crop loss, sudden and unplanned impacts on their existing operations, and limitations on planting. The Delta Conveyance Project's environmental review must acknowledge, identify, and mitigate for or eliminate such impacts.

730	Reclamation District 551	The massive proposed construction efforts within the district will have foreseeable impacts upon farming operations, and mitigation measures must be proposed accordingly. These impacts may include dust, noise, transportation, and drainage. Farming operations will be severely impacted during harvest due to increased construction traffic. Many bridges in the Delta only support one way truck traffic, which is currently a cause of traffic conditions in the Delta. Increased trucks due to construction will only exacerbate this issue, severely disrupting agricultural operations and those who commute through and within the Delta. Dewatering for construction and changes to groundwater levels associated with project operations threaten existing spray wells. Other economic impacts include making farming operations less efficient by installing infrastructure that breaks up property, and reducing the reliability of in-Delta irrigation. Conventional farming also depends on aerial pesticide applications consistent with the product's FIFRA label and California regulations. The presence of a large forebay in the district may affect how pesticides may be applied. The Delta Conveyance Project must develop effective practical mitigation measures to ensure farming continues without financial impact or physical impediment.
730	Reclamation District 551	A further issue which must be considered under CEQA is the effect on farming operations from birds which nest, feed, and otherwise inhabit the area of and around any new facilities. Due to the District's location along key bird migration paths, and its inclusion in the Delta, it is foreseeable that the new intermediate forebay will be a tremendous resource to a large bird population. That population will feed and roost on lands in the District that are in the vicinity of the new forebay. All of these impacts must be completely analyzed and proper mitigation must be proposed.
736	Kelley Taber County of Sacramento	The County's significant local concerns include: Lost agricultural production and loss of prime agricultural land due to facility construction and reasonably foreseeable socioeconomic impacts.
752	Amber McDowell Double M Farms	Agricultural product damage. Crop damage is a huge concern for my family. We grow Bartlett pears on Grand Island and it is our livelihood for our multi-generational family. Our harvest is a short 3-4 weeks in July and August. Delays on the road with traffic, construction stops, rough unmaintained detour roads or rough construction zone roads, and longer routes will impact the quality of our pears. Too much damage from bruising, extended sunlight on the top layer, and excessive heat buildup will quickly turn our high quality pears into worthless culls and a loss financially for our farm and family. Many residents in the Delta depend on the harvest of the Delta crops to support their family. Whether a farm owner or farm laborer, the success of the harvest affects their paychecks. Even the increase of greenhouse gases can impact the quality by ripening some of the fruit faster. The EIR needs to address mitigation for harvest time. Major crops include cherries and wheat in May and June, pears in July and August, alfalfa hay from May to October, wine grapes and corn in September and October, and much more. Thousands of agricultural truck trips travel in and out of the Delta throughout the year transporting the base economy for all of our Delta communities.

752	Amber McDowell Double M Farms	Tunnel shafts. The project states it will require a series of launch and retrieval shafts every 4-5 miles with each shaft requiring 400 acres for construction staging and material storage and a permanent footprint of 4 acres that will be 45 feet tall. This height would put each shaft well above the levee height and in sight for miles around in the Delta. These unsightly pillars will ruin the aesthetic natural beauty of the Delta, hinder the agricultural productivity of those farmers located along the tunnel track, and permanently disable their land to farm after construction. I request that the EIR address and mitigate for the financial loss of agricultural production at each of these sites.
779	Carol Kennedy and Bobby Ferreira	We have so much agriculture here is Discovery Bay, Byron, Brentwood and Oakley. There are new farms and vineyards popping up all over the area. We are becoming an huge exporter of fruit, vegetables and wine. What will they do for water?
805	Ashwani K. Rana	Delta farmers will also have their livelihoods negatively affected.
809	Martin Freitas	Delta farmers will also have their livelihoods negatively affected.
880	Muriel Strand	Factors to be considered for a complete and robust analysis of this project include: 2. How will this project affect sustainable agriculture?
890	Cheyene DeWeese	A tunnel project almost certainly destroys sustainability of any agricultural system and perpetuates the decline of wetlands, fisheries, farm land and any other green pastures where they still exist.

Table D-26. Comments Regarding Recreation

Letter	Commenter Name, Affiliation	Comment Text
48	Libby Lucas	Request you also address these specific areas of concern: - impacts to recreation boating both in loss of aesthetics of natural stream and of safety with current diversion, especially for canoes
143	Paul Anderson	As a California boater, I am very concerned about the significant negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.
152	Patrick Nolan	As a California boater, I am very concerned about the significant negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.
157	Julie Fouquet	As a California boater, I am very concerned about the significant negative impact that the closure of navigable waterways and tributaries - during construction of the "single tunnel" - will have on recreational boating for more than a dozen years.
162	Gene Beley	Why would you ruin the largest estuary on the West Coast of the Americas, destroy the Delta economy with boaters who come here from as far away as Los Angeles and Seattle, who won't return once they see the serenity isn't here any longer in anchor out places like Mildred Lake that will become a construction zone with bright lights on at night and loud activity, plus barges plying the waterways that will scare anyone.
165	David Mackler	As a California boater, I am very concerned about the significant and extensive negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.
195	David Fries Conservation Chair San Joaquin Audubon Society	Humans have the right under the Public Trust Doctrine to observe and enjoy the wildlife and natural beauty of the Delta, and wildlife habitat is a recognized beneficial use under the Bay Delta Water Quality Control Plan. Construction and operation of any conveyance system must fully protect this right. Access and quality of individual use of the Delta for fishing, boating, birdwatching, hiking or just watching sunsets, must be fully protected. This must include impacts on travel, by roads or by water, caused by truck and barge traffic or other disruption caused by construction and operation activities related to the project.
226	George Zdasiuk	I am concerned about the significant negative impact the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.
240	Tim Ellenberger	I am concerned about the significant negative impact the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.
242	Jack O'Laughlin	I am concerned about the significant negative impact the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.
246	James R. Sadler	I am concerned about the significant negative impact the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.

336	Tafari Lee	And another possibility, something I want to talk about, how come we never see people going out onto the Delta, you know? The first time I went onto the Delta was probably a few years ago. And I was scared to get into the water because I thought it was going to be dirty. I thought it was going to be polluted and stuff. And while it wasn't as bad as I thought it would be, if this is the direction that we're going in, it might end up being as bad as I thought it would be.
336	Tafari Lee	We're going to start seeing less people going onto the Delta boating, less people fishing. And the people who are fishing are going to be getting fish from contaminated waters and possibly eating -- possibly eating contaminated meat. The people who rely on fishing, the people who can't really afford to go out and just buy fancy foods, the people who need to fish the most are going to be hurting from this tremendously.
346	Mariah Looney Restore the Delta	Area residents will also be further cut off from access at waterways and their right to recreation guaranteed under the California Constitution.
374	Tim Neuharth Steamboat Acres	Concerned about impacts to recreation.
474	Laurence Mitchell	I come to you as one of many fishermen that all my people talk about, and it's sad to see that we have to always come and beg and plead and cry, yell for you guys to stop taking water from us (Northern California). my family depends on that fish. Depends on the eel, sturgeon, all that. You take that away from us. You take the water away from us, then we're nothing, and it's sad to see that you guys don't even bat a eyelash.
505	Lenora Clark	Recreational Boaters is concerned that significant negative impacts will occur with the closure of the waterways to navigation during the lengthy almost 13-year construction period.
509	Darlene Dawson	The tunnel will send an undetermined amount of water that will kill water sports, and water sports create a large economic amount of money to this area.
515	Lisa Combs	Our boats won't be able -- right now half of our boats can't even go down part of the rivers because they're so shallow. What's going to happen to the rest of the Bay?
519	Mike McCleery	We are going to be impacted by loss of recreation.
523	Kristen Olner	Consider recreational interests.

552	Nicole Suard Snug Harbor Resorts	The ongoing excessive diversion of flows away from the Delta waterways is continuing to cause financial damage to the commercial and recreation industry of the Delta. Excessive diversions are creating false "low tides" that leave very little fresh water flows in some Delta waterways, and strand boats in the mud at their docks. Excessive diversions are causing an explosion of invasive waterweeds in natural, historic waterways due to the low flows and higher water temperatures caused by insufficient freshwater outflows. Damage to boats, clogging of engines with mud or waterweeds, reduction of area recreation income due to the decline in fish species are all attributed directly to DWR current excessive diversion of Sacramento River watershed and Delta flows. DWR modeling during the Waterfix hearings did not appear to account for the many new or expanded diversions north of the Delta, and did not appear to account for the 3500 cfs or more of diverted flows through the Folsom South Canal extension nor the numerous in-Delta intakes built in the last 10 years. A complete assessment of Sacramento River current-as built and future water needs should be considered first before spending taxpayer dollars on planning and conveyance of flows that may never be available. DWR should be required to provide accurate and verifiable computer modeling and mapping including all known diversions from the Sacramento River watershed prior to the flow entering the North Delta area, as so much has changed in the last 15 years that previous computer baseline modeling is now obsolete.
558	Edward Schnee	The project will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
630	Alexandra Stehl California Department of Parks and Recreation	We would recommend that DWR consider how the proposed project may affect recreation areas at the new primary project facilities and in the facility corridor options and to incorporate suitable recreational activities at new facilities. Factors that may warrant consideration include changes to stream flows that affect use of recreational waters, direct impacts to recreational facilities such as demolition or removal of features, and changes in water quality that would impair water contact recreation, fishing, hunting or aesthetics.
720	Eric Gillies State Lands Commission	A thorough impact analysis should be included in the Draft EIR to evaluate impacts to proposed Project footprint during construction. Commission staff encourages a robust analysis of potential impacts to public access sites within the footprint of the proposed Project and any future maintenance requirements with the below surface construction of the conveyance tunnel. The analysis should consider how the public may be affected by the proposed Project relating impacts as a result of impacts to navigation and any mitigation proposing improvements along the impacted reaches within the San Joaquin Delta.

729	Erik Vink Delta Protection Commission	Recreation in the Delta must be protected and improved. The Delta is a "dreamland for boaters, birders, and outdoor enthusiasts", according to the Visit California, the State's tourism promotion organization. Its waterways, historic villages, nature areas, wineries, and food draw millions of visitors annually, and support a recreation and tourism economy that provides 3,000 jobs and $275 million in economic activity in the Delta counties –second only to agriculture as the key economic sector in the Delta's primary zone. Its diversity of recreation is available at a wide range of price points, serving local anglers who slip down a levee trail to fish on the way home from work, boaters with dockside homes, or international travelers. As an element of the SWP, the project has a responsibility to protect and improve these recreation assets, both in areas along the project's right-of-way suitable for multiple use and in habitat areas that may be restored to mitigate this project's adverse effects. State law authorizing the SWP, in its Davis-Dolwig Act, provides that recreation is to be among the purposes of state water projects and that facilities for recreation should be ready and available for public use when each state water project having a potential for such use is completed. Public facilities for outdoor recreation activities including picnicking, fishing, water sports, boating, and sightseeing, and the associated facilities such as picnic areas, parking areas, viewpoints, boat launching ramps, water and sanitary facilities, and any others necessary to make project areas available for use by the public are to be an element of any plan for SWP facilities. Plans for recreation are to be developed during DWR's project formulation activities through full and close consultation with local agencies, DFW, and the Department of Parks and Recreation (Water Code sections 1190-1191). When new recreation facilities would mitigate this conveyance project's adverse effects on the environment, their cost is the responsibility of the SWP's contractors (Water Code section 85089).Previous conveyance proposals and associated environmental review neglected to address this responsibility. This project and its EIR should not. It is one way the project could provide some few benefits within the Delta that can begin to balance, if only partly, the harm it will do in the region.

729	Erik Vink Delta Protection Commission	Assess and mitigate recreation impacts using up-to-date information. The project as proposed, including its construction-related traffic, barge installations, noise, and cultural and aesthetic impacts would significantly damage key Delta visitor attractions. The magnitude of this damage cannot be estimated, nor adequate mitigation proposed in the absence of up-to-date and accurate Information about recreation use in those areas. The Commission has information as we update our ESP, especially about recreation facilities and Delta-wide recreation use, that can be made available. But new surveys are needed to gather up-to-date data on recreation in areas affected by the project, just as wildlife or fish would be surveyed in a critical habitat to be damaged by the project. These areas include: •Legacy communities. In Hood, Clarksburg, Courtland, Locke and Walnut Grove, information about visitor use for food, wine, boating, and heritage tourism should be gathered through surveys of visitors to restaurants, wineries, museums, and historic districts. •Recreational boating and fishing. As proposed, the project would adversely affect very popular boating and angling areas, including the Lost Slough-Snodgrass Slough-Delta Meadows anchorages and marina complexes at Walnut Grove and New Hope Landing, the Mokelumne River south toward the confluence with the San Joaquin River, including the anchorages at Sycamore Slough and the nearby Tower Park Marina, and in the south Delta, Bullfrog Marina and anchorages at Mildred Island and Horseshoe Bend. These areas are critical to recreational boating and angling, just as other areas are for fish and wildlife, and deserve an equivalent level of attention as the EIR is developed. Delta-wide information on recreational boating has recently been gathered by DBW, but its report does not detail areas of special use by Delta boaters. The Sacramento River Boating Guide by Bill Corp, Franko's Map of the California Delta, Visit the Delta's Heart of California map, and Hal Schell's book, Dawdling on the Delta have useful information on popular local boating and fishing areas that are along the project route. We recommend that DWR augment these reports by gathering current information in two ways. First, we suggest that aerial photographic surveys of boater use be undertaken on both weekdays and weekends during each Delta boating and fishing season so that photointerpretation can be used to identify locations and quantity of these activities. Such approaches are common on other waterways and in waterfowl surveys. Second, we encourage you to meet directly with marina operators in and near the project area to obtain their information about levels of boating use and popular areas and activities among their customers. The SEC process has recently included comments from participants about areas rarely mentioned by outsiders but beloved by locals, such as the "bedrooms." •Driving for pleasure. This is another popular recreation for Delta visitors that would be harmed by project-related disturbance and traffic congestion. The Commission's ESP identifies "right-of-way" activities as among the most popular in the Delta. Survey research could be used to quantify the level of this use as well as popular routes. •Wildlife viewing. USFWS and The Nature Conservancy should be contacted for estimates of visitation at Stone Lakes NWR and Staten Island. As with other topics we have discussed, we raise these issues at this early scoping stage because there is enough time to gather this information now as the EIR is drafted. To do otherwise would not be using the best available science to assess impacts on activities that are so important to the Delta's economy and culture.

729	Erik Vink Delta Protection Commission	Avoid or mitigate recreation impacts now. Avoiding or reducing noise, construction-related disturbance and traffic congestion, barge traffic that hinders recreational boating, and aesthetic disturbances around important recreation destinations and recreational travel routes is essential. Because recreation is such a vital element of the Delta's resources, measures to avoid or mitigate adverse effects should be described now, while the project is being formulated, as the Davis-Dolwig Act requires, rather than being deferred until after the project has been approved, as was proposed by the BDCP/WaterFix EIR. Recreational operators affected by the project, whether public agencies or private visitor-serving facilities, as well as organizations representing boaters, bicyclists, and other visitors, should be involved early in devising these measures. At a minimum, these measures should comply with the Delta Plan MMRP 18-1 through 18-3.Visitor-serving businesses adversely affected by the project should be eligible for assistance through a business interruption fund, as described under the land use section. Special note should be taken of the Delta Plan MMRP's provision that where impacts to existing recreation facilities are unavoidable, lead agencies must compensate for impacts through mitigation, restoration, or preservation off-site or creation of additional permanent new replacement facilities(emphasis added). Such mitigation should be capable of fully offsetting the project's damage to recreational uses and areas, as would be expected of habitat restoration to offset lost wetlands, separate from and in addition to upgrades or repair of existing recreation areas, rather than unspecific assistance to unidentified future projects, as was proposed in the BDCP/WaterFix EIR. The process of consultation recommended above should be employed to identify potential mitigation measures, but we suggest three potential actions as examples that could be considered to compensate for otherwise unavoidable damage: (1) Develop a boating trail and boat-in recreation facilities, including angling, waterfowl hunting, and boat-in day and overnight facilities, at the Cache Slough-Lookout Slough-Liberty Island-Prospect Island habitat restoration complex, to be managed out of local marinas or resorts or new facilities to be developed in Rio Vista, to compensate for lost recreational boating routes and anchorages on the Mokelumne River and its tributaries. (2) Cooperate with the East Bay Regional Park District to improve its property on Palm Tract adjoining Orwood Resort, linked to a boating trail extending north to Rock Slough, down Old River and its connecting sloughs to the Dutch Slough park and marsh restoration site, Big Break, and Antioch's marinas, to offset damage to south Delta recreation uses; (3) Develop walking tours of Locke and Walnut Grove, including pedestrian improvements to link the communities across the old Sacramento Southern right-of-way at the Delta Cross Channel, interpretive materials, fishing access at the Cross Channel, connected to a bicycle path along the old Sacramento Southern right-of-way extending north to Hood or beyond, to compensate for damage to recreation at Sacramento River legacy communities. None of these measures may ultimately be sufficient, desirable or feasible. They are offered only to illustrate the scale of compensatory mitigation that may be needed to offset the project's adverse effects on Delta recreation.
736	Kelley Taber County of Sacramento	The County's significant local concerns include: Significant impacts on recreational opportunities.

747	Jan McCleery Save the California Delta Alliance	I appreciate the changes DCA made to the plans to address boating and recreation. The plan no longer includes the barge traffic in narrow sloughs that is so dangerous for boating, nor building many barge docks throughout the waterways, blocking recreation and boat traffic.
747	Jan McCleery Save the California Delta Alliance	Recreation noise and construction lighting impacts
747	Jan McCleery Save the California Delta Alliance	I am very pleased that the DCA moved away from barges in small sloughs, recognizing that they are a safety issue for boats. Thank you. Barges may be useful in the main channel, but use elsewhere should be avoided. From a boating and recreation standpoint, eliminating barges being used in significant way WaterFix planned and going to rail instead is very welcome.
747	Jan McCleery Save the California Delta Alliance	Barge landings prohibit waterways from being used as recreational use. Those sloughs would have to be closed down or limited to 5 MPH zones. There was extensive testimony about barges and barge landings at the SWRCB Permit Hearings and the DSC Consistency Hearing. Testimony was given that the barge traffic would virtually shut all boating down in the Delta, seriously impacting the marinas and boat-related businesses. Most of these are small mom and pop businesses. Why Is boating and recreation important for the Delta? Boating and recreation businesses comprise the bulk of the economy of the communities in the Delta. To have boating stopped for ten or more years would destroy the community, people would lose their homes. In addition, causing gridlock on Highway 4 would negatively impact people from getting their boats into the Discovery Bay Marina.
747	Jan McCleery Save the California Delta Alliance	The remaining issue is one of noise. The reason boaters like to anchor out is to enjoy an evening of peace and quiet, in nature, being lulled to sleep by the sound of water ripples lapping softly at the hull. 24x7 construction pounding and construction lights are incompatible. I would hope the work could be shut down entirely, not just the barges restricted, from Friday through Sunday during the boating season (June through the end of September) to allow boating and recreation to continue.
747	Jan McCleery Save the California Delta Alliance	The Bedrooms Anchorage versus Bouldin Island Launch Shaft As stated earlier, the barge location in Little Potato Slough would conflict with a popular boating area referred to as “The Bedrooms.” DCA stated they would review moving the dock closer to the channel and recommend there not be barges activity around that area on weekends. “The Bedrooms” – a common anchorage for weekends. Besides being used heavily by local Delta boaters, “The Bedrooms” are a popular anchorage in the summer for folks from the Bay area. Bringing in people from other areas supports local marinas and businesses.

747	Jan McCleery Save the California Delta Alliance	4th of July Hilton Firework Display – Mandeville Island Shaft One of the biggest events on the Delta occurs during the 4th of July holiday. The Hilton Family used to own a hunting lodge on Venice Island. Every year they hire a barge filled with one of the most awesome fireworks and put on the best 4th of July fireworks displays in Northern California. The barge is anchored between Mandeville Tip and Venice Island as shown above. The weekend before the event, boats head out to secure a place to tie up, raft, anchor, etc. Similar to the earlier comments about The Bedrooms Anchorage, since the Mandeville Island Maintenance Shaft is so close to where this activity occurs, it is very important that that work be shut down there also during the July holiday timeframe. I'd recommend working with yacht clubs each year to coordinate the best schedule to not impact thousands of boaters with evening noise and objectionable lights while they anchor out.
747	Jan McCleery Save the California Delta Alliance	Mildred Island is a flooded island situated in the center of the South Delta waterways. Mildred Island is about halfway between Bethel Island and Discovery Bay, in the center of the South Delta. Mildred Island flooded in the early '80s and was never reclaimed, making it the perfect anchorage spot. Mildred is the best-known anchorage spot in the South Delta. Having boats anchoring out is important for the marinas in the South Delta and is why we kept our boat for years at Bethel Island before we moved to Discovery Bay, so we could commute from Silicon Valley with our family and anchor at Mildred on the weekends. Mildred is a well-known anchorage. On Labor Day, the Sea Ray Club brings 40 to 100 boats and forms a complete, perfect circle: quite an engineering feat. Numerous boating and yacht clubs use the Mildred Island anchorage regularly. In addition, numerous other groups and single boats anchor at Mildred Island for a weekend, a week, or more. No other South Delta location can provide an anchorage for so many boats. The importance is that all of these boats that have been drawn into the South Delta to anchor out use their runabouts during the day. They will run over to Bull Frog Marina for gas and an ice cream, or to Tiki Lagoon, or to other small marinas while they spend the day out water skiing or wake boarding throughout the favorite recreational sloughs. Or they go to Discovery Bay for gas and to the Chandlery to buy forgotten items. They may eat lunch at The Boardwalk Grill in Discovery Bay, or the Union Point Grill on Middle River, or jaunt over to Bethel Island to one of the restaurants there. It is important for the small marinas and business throughout the South Delta to have a nice large anchorage to lure boaters in. But there is the Bacon Island Reception Shaft – right next to the doggy beach where people like to anchor to paddle their dogs ashore. A noisy, lit up construction site is incompatible with an anchorage.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor, even with the decision to not fill it with barges, construction noise will still ruin the boating experience.
747	Jan McCleery Save the California Delta Alliance	The other concern is that boaters anchored in Mildred Island enjoy the sunsets, watching the sun set over Mt. Diablo to the west. A raised shaft, electrical transmission wires, etc. across the view are yet another way this project will ruin the enjoyment of the Delta for many, many years.

747	Jan McCleery Save the California Delta Alliance	It "may" help if the Bacon Island shaft could be positioned for minimum impact on the Mildred Island anchorage, preferably moved to the far south end of Bacon or over to Woodward Island. Woodward Island has a new, 30-foot high bridge and upgraded levees to protect it from risk of levee failure.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor Issue Summary: Boating Issues: It has the most negative impact on boating and recreation and the economy of communities and small business supporting boating.
747	Jan McCleery Save the California Delta Alliance	Eastern Corridor Issue Summary: Boating Issues: It may still have impacts I am not aware of (I do not boat in that area). But that area is less used for boating and recreation.
752	Amber McDowell Double M Farms	Tourism. The small service businesses such as restaurants, wineries, farm stands, grocery stores, bait shops, realtors, and art galleries are a crucial component to the economies of each community. Summertime is an important time for all Delta communities with tourism. We are part of the Delta Farm & Winery Trail that helps nearby cities and tourists find our fresh produce and local wine. This organization brings together Delta farms that are open to the public to promote agricultural education, provide healthy and locally grown produce and wine, and to help strengthen our Delta economy. Many car and bike clubs take drives through various parts of the Delta, bird watchers and sightseers look for quiet, out of the way areas, wine enthusiasts and foodies visit the various wineries and fresh produce farms. In addition, families come to experience the cultural aspect of our historic towns, fishermen search for new quiet fishing holes, and boaters enjoy the water recreational activities. The Delta contributes over $35 billion to the state's economy. Without easy and enjoyable access into and throughout the Delta, people will not visit the Delta. This loss of revenue for our community, especially lasting for over a decade, will kill the Delta towns and our generational family farms. I request the EIR include tourism loss impacts on the local economy.
819	Clyde B. Thorington	As a California boater, I am very concerned about the significant Negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more then a dozen years.

954	Jan McCleery	The BDCP/WaterFix EIR was lacking related to identifying the huge impacts to boating and recreation from the Through-Delta Alignment (now called the "Central Corridor") and related impacts to boating-related businesses (marinas, restaurants, etc.) throughout the Delta. It also didn't identify the related economic impacts to boating-based communities like Bethel Island and Discovery Bay. One problem was that it didn't appropriately identify the key boating areas. I strongly recommend Hal Schell's book "Dawdling on the Delta," although it is quite old, it still identifies key areas of the Delta for boating and is a good reference. There are two types of boating that utilize waterways differently: (1) Recreational boating (water skiing, wake boarding, tubing). For recreational boating, narrower sloughs that don't have as much big boat traffic are preferred. Waterways with tules on the side are great for dampening down the boat waves and smoothing the water between the skiers/boarders. Also waterways that have some type of tule berm divider are ideal to control traffic for safety and smooth water. And, obviously, the waterways cannot be blocked or have 5 MPH zones, else the skier needs to drop and be dragged around the obstacle. In other words, recreation and 5 MPH zones are incompatible. In particular, barges and barge docs would drive recreation out of the Delta. In the South Delta, the favorite recreation waterways include: (a) "Twin Sloughs" - the parallel sloughs formally names “North Victoria Canal” on the right (south) and “Woodward Canal” on the left (north), named after the islands they run next to. This is a long straight waterway with a berm dividing it for boat control. (b) Victoria Canal - the slough south of Victoria Island. It is another long, straight canal with a tule berm dividing it. (c) The waterways between Bacon Island and Mildred Island. This is very popular doe to its proximity to the Mildred Island Anchorage. (d) The waterways north of Bacon Island around the Quimby Island area. NOTE: The WaterFix EIR was going to totally block Twin Sloughs. (2) Bigger boats that allow people to anchor out are an important part of boating on the Delta. The main anchorages should be listed in the EIR, plus other areas where boaters frequently anchor out. Having people from throughout Northern California come to the Delta is key to Delta communities' and businesses' economy. In the South Delta, the main destination to anchor out is Mildred Island (it was not listed in the WaterFix EIR as a "Recreational Area." That needs to be remedied.) Boaters that anchor out use their runabouts to go to the local marinas for gas, for ice cream, to eat lunch. They spend money. During the day, those with recreational boats in-tow then go to the nearby waterways to ski/wakeboard/tube. That is what makes the sloughs between Bacon and Mildred so popular and north of Bacon Island. Other areas common for anchoring should be identified. In the document I sent I show popular anchor spots in addition to Mildred. All of these anchorages should be identified. Boaters want quiet anchorages. They do not want to hear pile driving day and night. They do not want construction lights at night. They don't want pollution from construction trucks, dust, and activity. CONCLUSION: Any consideration of boating and recreation makes it obvious that the Central Corridor is incompatible with boating and recreation. WaterFix EIR failed to recognize the issues. Since the Eastern Corridor is also located on Delta islands, the impacts of that route on boating and recreation and resulting economic impacts deserves attention. The ITRC's far eastern I-5 route is the only route that truly goes around the Delta to protect it from construction. (That also protects waterfowl and waterways). The No Tunnel alternative is strongly preferred.

Table D-27. Comments Regarding Socioeconomic Resources

Letter	Commenter Name, Affiliation	Comment Text
87	Jaclyn Shaw	(4) TEMP CONSTRUCTION JOBS? would displace #1 agricultural industry to San Joaquin Economy and of generational food productions?
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Reasons this project should not be built: Building the tunnel, regardless of the route, would seriously damage the economy in the north Delta and the towns of Hood, Courtland and likely Locke and Walnut Grove. The farmers in this area have been here for generations, for some families since the levees were first built.
235	Tim Stroshane Restore the Delta	Affordability of a new DCP for ratepayers in environmental justice communities in the service area of all state water contractors, including Metropolitan's, must be addressed.
326	Orion Camero	And the environmental justice issues, this project would aggravate air quality by truck emissions for construction, as I mentioned, increase algal blooms, that would severely harm the waterways irreparably and directly complicate the local water supply in the Delta region.
327	Jasmine Delafrost	I'm a community organizer that works directly with young people around educational equity, juvenile justice work, and other intersectional issues that have pressed our communities for decades. We recognize that through this process, we wanted to be more equitable. I'm here to talk about the collateral damages when we make decisions without understanding the full impacts it can have on our people here in Stockton. And this is not an isolated issue. We understand that. We also know that there are deeply other impacts of quality of life, particularly, families in south Stockton and in Stockton.
327	Jasmine Delafrost	My question to you is do you want to create an additional layer of barriers for youth that I work with everyday who contribute to life expectancies and around health outcomes and more? I'm asking that this plan ensures there's equity in the plan that, otherwise -- I'm asking that this plan ensures there's more equity in the plan. Otherwise, our community pays the price, both environmentally and economically.
327	Jasmine Delafrost	And, lastly, can this all be mitigated? Can all of these challenges that the tunnel proposal be included in this process?· If not, we run the risk of making this final plan a disaster. We run the risk of a disaster. And although I may not understand climate change or, like, do this work by myself, I understand that when I work with young people, these are consequences that impact them every single day of our lives. And that when you fail to address young people and all that they're facing, the consequences can be damaging and unrepairable [sic].

329	Nicholas Hatten LGBT+Social Justice Initiative	…just like policy and that will elevate our marginalized people, when ignored, these today we're facing once again. Well, unlike those times, we're here to say "Enough." You know, and unlike the members of the academy, we have science as a tool to guide us through this process. Please be mindful that the direction that we go to or go through has greater impact for people of color and our LGBT people and the people of south Stockton.
329	Nicholas Hatten LGBT+Social Justice Initiative	Let's fix this process so the end result, there's equity. Mediate, appoint a receiver, do whatever you have to do to make this equitable. If you don't, our very own director will be making a movie about Stockton and the Delta region and how it's at the receiving end of California's new two-class system.
337	Elaine Baret Little Manila Rising	Stockton, especially south Stockton, has already disproportionately higher rates of poor environmental and health outcomes, from ninety-five to a hundred percent pollution burden, high diesel particulate matter, and particulate matter to high poverty rates and extremely high asthma rates based on CalEnviroscreen indicators.
337	Elaine Baret Little Manila Rising	When we look at history, we recognize that many of those health outcomes are a result of historic disinvestment dating back to the 1930's red lining practices that have been done, and in Stockton, building the cross town freeway right through marginalized communities and communities of color and more specifically, the community of Little Manila. Little Manila was home to the largest Filipino population outside of the Philippines from the 1920's to the 1960's. We have a rich history in the Delta. A lot of my ancestors, our moms worked in the fields; but, also, they did a lot of the labor work to build the levee surrounding the Delta.
337	Elaine Baret Little Manila Rising	It's like we're experiencing historic amnesia for our communities like what happened with the cross town freeway. A lot of our communities I work with is new to environmental justice. And that's because environmental justice unfortunately, it is not a concern on them. Our communities are already suffering, and we're more worried about surviving and living day to day.
343	Margo Praus Sierra Club of California	The valley always seem to be on the end of receiving the leftovers, the throwaways. And the disadvantaged communities in the valley often do not have a voice. They do not deserve to be harmed more and more. And, yet, that's what seems to be occurring.
346	Mariah Looney Restore the Delta	For those of you unfamiliar with Stockton, CalEnviroscreen shows that this zip code is in the ninety-fifth percentile for degraded environmental conditions. Unfortunately, this is not an uncommon statistic for Stockton environmental justice communities. Most neighborhoods in south of east Stockton share these degraded environmental conditions. According to the 2018 report on the Status of Women in Stockton done by Mayor Michael Tubb's office and other community leaders, thirty-nine point six percent of the City of Stockton's population is under the age of twenty-five.

347	Jaelyn Sanidad	I am Filipino, and I am only nineteen years old. I was born and raised in Stockton, and there is actually a lot about my city that I don't know. And one of the main reasons to blame is environmental injustice. I am speaking to you as a Stocktonian, a young woman and just a normal kid from the south side. The thing about children is that every kid has dreams of traveling to new places and making new adventures filled with green fields and blue waters. Except for that in today's society, a lot of our children have grown up too fast in order to fight for their lives. Zena Abdul Karu, (ph) eighteen years old, Muslim environmental activist; Amarianna Copeny, Little Ms. Flint, thirteen years old, black environmental activist; Minitsa Flaco, (ph) twenty-three years old, environmental activist of the Amazon Rainforest, whoever said that we aren't here hasn't been paying attention. Our youth are ready to go. What we are doing by going forward with these projects is snatching away our children's dreams and hopes. The older generation may be the ones making the decisions now. But we need to remember that it is the youth and our future generation that will be the ones living in your consequences. Children are forced to grow up too fast in order to repair and fix problems that they never even created. But why is that? Just a few days ago, on February 12th, ABC News published a report revolving around Stockton and our opportunities offered to our children. Stockton was ranked among one of the worse places with opportunities for our youth. Reporters in the publication stated that there's a pattern with central valley metro areas and how they are the most very vulnerable to poverty. With this project, wouldn't we just be further proving their point and deteriorating our children's lives? It would be a shame, and I would be disappointed -- disappointed for real if this project were to move forward. Environmental racism and injustice has made its dent in Stockton, our motherland, for far too long. I am not just a statistic to play with. We're here fighting for our lives. We are nature defending nature, and that's what it is.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the considerable impacts to California's salmon people, who include salmon dependent Native American Tribes and coastal fishing communities.
360	Josephine Avila	I don't want my children to have to lose their homes just to have these tunnels put in – or anybody else's.
571	Karen Jacques	The EIR should analyze impacts on the economy of the Delta and to what extent construction of the tunnel will turn impacted communities and their economies (including Delta area farms) into economic sacrifice zones.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent will the DWR and DCA consider the potential economic impacts of the project on farmers in the California Delta? How will the project potentially degrade long-term water quality in the delta, and for the hundreds of thousands of people in San Joaquin, Contra Costa, and Sacramento Counties who rely on delta water, such as residents of the City of Stockton? In the event of marked water quality decline, how will the DWR and State of CA compensate affected consumers? Will the State pay for the healthcare of those adversely affected?

574	Philip Merlo San Joaquin Historical Society & Museum	To what extent has the DWR evaluated the impacts of the project on the property values of residents in the primary and secondary zones of the Delta, especially with respect to the decline in quantity and quality of water in Delta waterways, but also as a result of the industrialization of the Delta, increased traffic due to construction and maintenance, and the loss of viable farmland expected as a result of this project ? Do the DWR and State of CA plan to forecast these impacts? Do the DWR and State of CA plan to compensate Delta communities for the long-term (50-100 year timescales) decline in property value that the project will likely precipitate?
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	As an example of the indirect impact and socioeconomic negative effect of the Project on Residents, each of the Residents, and the Clarksburg Community, the Residents, each of the Residents, and the Clarksburg Community will suffer substantial disruptions, or cessations, in operation because of the Project through potential levee damage, increased traffic, road and street damage, increased accidents on the roads and in other places, increased noise, increased wear and tear on Community facilities, disruption or cessation in well water operations and well water availability, disruption and cessation in septic and wastewater operations and availability, and in related operations.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	State and analyze the socioeconomic impacts of the Project on the Residents, each of the Residents, the Clarksburg Community and each significant part of Clarksburg Community, and the North Delta.
684	Jeff McCormack John McCormack Co.	Our property would decline in value as a result of the construction, so that should be included as a socioeconomic impact in your cost-benefit analysis. Land taken out of production should be counted as well.
684	Jeff McCormack John McCormack Co.	Finally, we also have ranches on islands along the main Sacramento River. Reductions in water availability for those, and competition for remaining supplies in the coming drought periods could put us out of business, along with the jobs we create for people in local communities.
698	Steve Lambert Butte County Board of Supervisors	The DCP and the EIR must fully describe the project's socioeconomic impacts in every impacted area. The BDCP/WaterFix limited the analysis of socioeconomic impacts to Delta counties. However, as noted elsewhere in the EIR/EIS, the BDCP/WaterFix would have impacted a much larger area. The BDCP/WaterFix EIR/EIS failed to assess the direct and indirect impacts from the BDCP outside the Delta. The DCP must assess impacts to the region north of the Delta consistent with State and Federal law. The DCP must analyze the socioeconomic impacts of the entire affected environmental setting of the proposed projects and alternatives.
704	Eric Jenks Wilbur-Ellis Company	If a launch site or other Project component near the Twin Cities facility is included in the proposed Project, the EIR should (a) should fully analyze the environmental and related impacts of such Project component, including impacts to the local economy in the Delta, northern San Joaquin and southern Sacramento county regions.

704	Eric Jenks Wilbur-Ellis Company	In its consideration and any approval of the Project and alternatives, DWR should take into account the socioeconomic effects, including on Wilbur-Ellis, the Twin Cities facility, and the growers in the Delta and surrounding areas who depend on agricultural products and services from the Twin Cities facility. CEQA Guidelines, section 15126.6 (economic viability of alternative sites should be considered in determining feasibility of alternatives, including whether project proponent can reasonably acquire the site and costs of acquisition) The economic importance, value and potential acquisition cost of the Twin Cities facility is high, and the economic consequences of disruption or closure would be severe. If an alternative location were available to serve growers in the Delta and surrounding area, the cost to relocate the Twin Cities facility would be in excess of $10 million (based on W-E's experience siting, permitting and constructing a facility of similar size and nature), and it would potentially take 24 months or longer. But even at that high cost and extended time, relocation is not a viable option. W-E has previously looked for alternative locations for the Twin Cities facility, but none was available within 10-15 miles of the current location that would meet the needs of Wilbur-Ellis and its customers. Furthermore, in considering the Project and alternatives in the EIR, and in ultimately making any Project approval, DWR should take into account socioeconomic effects on growers and the agriculture industry in the Delta and surrounding area, as well as ripple effects on the regional economy.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Tourism. The small service businesses such as restaurants, wineries, farm stands, grocery stores, bait shops, realtors, and art galleries are a crucial component to the economies of each community. Summertime is an important time for all Delta communities with tourism. Many car and bike clubs take drives through various parts of the Delta, bird watchers and sightseers look for quiet out of the way scenic areas, wine enthusiasts and foodies visit the various wineries and fresh produce farms. Families come to experience the cultural aspect of the historic towns, fishermen search for new quiet fishing holes, and boaters enjoy the water recreational activities. The Delta contributes over $35 billion to the state's economy. Without easy and enjoyable access into and throughout the Delta, people will not visit the Delta. This loss of revenue for our community, especially lasting for over a decade, will kill the Delta towns and generational family farms. We request that the EIR include tourism loss impacts on the local economy.
718	David Strecker San Joaquin Farm Bureau Federation	Tourism. The small service businesses such as restaurants, wineries, farm stands, grocery stores, bait shops, realtors, and art galleries are a crucial component to the economies of each community. Summertime is an important time for all Delta communities with tourism. Many car and bike clubs take drives through various parts of the Delta, bird watchers and sightseers look for quiet out of the way scenic areas, wine enthusiasts and foodies visit the various wineries and fresh produce farms. Families come to experience the cultural aspect of the historic towns, fishermen search for new quiet fishing holes, and boaters enjoy the water recreational activities. The Delta contributes over $35 billion to the state's economy. Without easy and enjoyable access into and throughout the Delta, people will not visit the Delta. This loss of revenue for our community, especially lasting for over a decade, will kill the Delta towns and generational family farms. We request that the EIR include tourism loss impacts on the local economy.

729	Erik Vink Delta Protection Commission	Protect People as Well as Wildlife Delta residents and recreationists must be protected as effectively as its fish and wildlife. Like the fish and wildlife that receive so much attention, our multiracial population is also at risk. Too many residents and workers have low incomes, and others' jobs rely on water-dependent farms or tourism. The communities where they live and work, the waterways that attract our recreationists, and the highways traveled to jobs and shopping, to ship our produce, and to draw visitors are as critical as the river channels and other habitats where wildlife and fish live and migrate. Impacts to the Delta's residents and visitors should be assessed using current data, not outdated information or guesswork. Alternative points of diversion that avoid damaging our communities deserve the same consideration as locations that minimize harm to fish. Specific actions to reduce damaging effects should be spelled out whenever feasible, not deferred to be worked out later. Performance standards should be clearly stated. When harm is unavoidable, compensation to offset damage must be provided, just as it is for damage to waterfowl or salmon.
731	Mark Pruner Clarksburg Fire Protection District	As an example of the indirect impact and socioeconomic negative effect of the Project, the District will suffer substantial disruptions, or cessations, in operation through increased traffic, increased noise, disruption in well water operations ana availability, septic and wastewater operations and availability, and use of the Fire district property.
731	Mark Pruner Clarksburg Fire Protection District	EIR must fully analyze the impacts on continued and future support of the District, its Mission, and its property, from the Clarksburg community and the North Delta, including the impacts of any de-population in the District, and on the economies of these areas, as a result of construction, operations, and management of the Project.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must state and analyze changes in the District, mission of Clarksburg Fire, and on District property caused by the project, including changes in community cohesion, a reduction of opportunities for maintaining face-to-face relationships, and disruptions to the functions of the Clarksburg community and North Delta community organizations and gathering places.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must analyze the socioeconomic impacts of the Project on the District, the Mission of Clarksburg Fire, on Fire District Property, and on the Clarksburg community and the North Delta.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	An example of the indirect impact and socioeconomic negative effect of the Project, the Schoolhouse Project will suffer substantial disruptions, or cessations, in operation because of the Project through increased traffic, increased noise, disruption in well water operations and availability, septic and wastewater operations and availability, and on the use of the Old Schoolhouse as an historic structure.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	EIR must fully analyze the impacts on continued and future support of the Old Schoolhouse Project from the Clarksburg community and the North Delta, including the impacts of any de-population in the community, and on the economies of these areas, as a result of construction, operations, and management of the Project.

732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must state and analyze changes in the Clarksburg community, the Old Schoolhouse, and the Old Schoolhouse Project, caused by the project, including changes in community cohesion, a reduction of opportunities for maintaining face-to-face relationships, and disruptions to the functions of the Clarksburg community and North Delta community organizations and gathering places.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must analyze the socioeconomic impacts of the Project on the property on the Old Schoolhouse Project, the Clarksburg community and the North Delta.
736	Kelley Taber County of Sacramento	The Project, if approved and constructed, will impact County residents, public facilities, and businesses in myriad and far-reaching ways. The residents and communities of the County will bear a disproportionate burden of the likely numerous significant unavoidable environmental impacts, which will benefit only agricultural and urban water users south of the Delta. The proposed water infrastructure facilities will slow or prevent the realization of the Delta National Heritage Area's economic development, tourism, and historic preservation goals that are critical to maintaining the "Delta as a Place."
736	Kelley Taber County of Sacramento	The County's significant local concerns include: significant negative impacts to the short- and long-term livability, prosperity, economic structure, and historic character of the communities in the Delta.
853	Susan Alexander	The EIR must analyze the tunnel's cumulative impacts, with particular focus on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents.
884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - New impacts to Discovery Bay from the new, closer shaft and includes dust, noise, car traffic, navigation disruptions, and devaluation of property during the construction of the tunnel.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft.: Reduced property value
907	Linda Hall	Heritage towns will be destroyed.
931	Jacob Mor	Moving forward with this plan will destroy entirely the livelihood and quality of life of our community and will force us to unfortunately sell the house and move out of this place. This is our retirement place we choose to live and with this plan I am not sure where to go with limited budget based on Social Security income.
997	Cristina Mathews	Governor Newsom's tunnel plan not only dooms fish populations to extinction, but if further erodes the ability of California's coastal communities to make a living from the sea.

Table D-28. Comments Regarding Aesthetic and Visual Resources

Letter	Commenter Name, Affiliation	Comment Text
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Show how visual disturbance, as well as construction-related impacts to the Residents, each of the Residents, and the Clarksburg Community, or any significant part of the Clarksburg Community, will be minimized.
721	Michael McDowell Double M Farms	Intermediate Forebay. The size and location of the Intermediate forebay is a concern. The 30 foot high embankments would place this feature well above the levee by potentially 10-20 feet and in sight for miles around the delta.
729	Erik Vink Delta Protection Commission	The Delta's landscape is integral to its qualities as a place. The Delta is characterized by many diverse and often contradictory visual attributes: it is a vast flat sweep of land and water, yet with its willow and cottonwood-lined levees, farm buildings and historic communities, water towers and, on its horizons, wind turbines and Mount Diablo, it is not a featureless landscape. The aesthetic appeal of the Delta is as varied as the character of the farmed landscape, the waterways and marinas, the towns and communities surrounding favorite recreation areas. County general plans identify especially prized scenic routes and corridors near the project's proposed footprint: •Sacramento County: Highway 160, a State scenic highway; River Road, also a State scenic highway; Isleton Road; the Sacramento River, and other Delta roads atop levees bordering Delta sloughs. •San Joaquin County: Interstate 5 north of Stockton; Eight Mile Road on Kings Island and Bishop Tract; West Lower Jones Road and Zuckerman Road surrounding McDonald Island; Bacon Island Road along Middle River; and Highway 4 west of Bacon Island Road. •Contra Costa County: Highway 4 west of Old River; and the Byron Road. In recent surveys of residents and visitors, a common theme volunteered was that coming to the region is like stepping back in time, and how extraordinary that such a place could exist within an hour or two of the Bay and Sacramento metropolitan areas. One of the last lowland areas of the state to be tamed and settled, the Delta continues to be relatively hidden and remote. Few roads traverse it, most of its bridges are historic structures, and a few crossings are still accomplished by ferry. A great quiet and a slow pace rule. These qualities provide a baseline that should be preserved by minimizing the project's alteration of Delta landforms. The Delta's landscape ranks high among the qualities that make the Delta "home" to residents and frequent visitors. It is often observed that people come to the Delta to get away from city life. They can do so with relative ease because the Delta Protection Act and county general plans have ensured that urban-type development stays for the most part at the outer edges in the secondary zone. These aesthetic qualities should be protected as carefully as key attributes of wildlife and fish habitats. The visual resources of the Delta are literally the outward manifestation of the existing land uses. Thus, all adverse project impacts affecting land use will play out visually and with a compounding, profound effect.

729	Erik Vink Delta Protection Commission	The Project's Decade and a Half of Landscape Alteration Brings Radical, Not Evolving Change. The principal elements of the conveyance project are mainly constructed in the primary zone, which otherwise receives the highest level of protection from changes that would radically alter its landscape, as described in the Land Use section. These principal elements include the two Sacramento River intakes, three or more tunnel boring machine (TBM) launch shafts along the tunnel's route, and roughly ten reception and maintenance shafts at various locations along the 40-mile alignment. Below are described some of the concerns related to each of the principal elements.
729	Erik Vink Delta Protection Commission	•Project intakes. The project intakes, regardless of configuration (Intakes 2 and 3 or 3 and 5), would permanently damage scenic resources viewed by boaters on the Sacramento River or motorists on Highway 160 and the River Road, designated State scenic highways, that pass through the communities of Clarksburg, Hood and Courtland. The visual impacts of the facilities including the intakes themselves, new haul roads, road widening and bridge modifications of Hood-Franklin Road, and interchange improvements (in the Intake2 and 3 configuration, potentially an entirely new interchange at Lambert Road and I-5) would be significant and unavoidable.

729	Erik Vink Delta Protection Commission	Launch Shaft Sites. At the launch sites, construction support complexes would be necessary with high-voltage power supply to operate the TBMs, sufficient area to dewater and stockpile tunnel material until it is moved offsite, and where concrete batch plants would be co-located. The launch sites are also where the 40-foot diameter concrete tunnel liner sections would be delivered by truck, train or barge, necessarily surrounding the sites with a web of transportation corridors. Launch shaft sites would have a massive visual impact on the landscape. The visual blight would extend through the Stone Lakes NWR where widening Hood-Franklin Road is likely. Potential avoidance strategies to reduce traffic or other impacts to existing roads, such as constructing haul roads, would increase visual impacts. Mitigation measures, such as landscape and vegetation barriers, visitor centers or kiosks, interpretive signs, and viewpoints, could provide some relief but would not prevent the permanent alteration of this landscape by the project. Barge landings and related dredging would degrade scenic waterways, such as Snodgrass Slough, the Meadows, and Sycamore Slough. Some siting approaches that appear to be under consideration by the DCA such as the northerly launch shaft site at "Glanville" Tract (located in Granville Tract) push the impacts of the 290-acre "consolidation" facilities east towards and in that case beyond I-5, outside the boundary of the legal Delta. This would reduce local visual impact somewhat but construction of new haul roads and widening of Diersson Road would be required, as well as a conveyor system to carry tunnel material from the launch shaft across fields to the consolidation facilities between Diersson Road and Twin Cities Road. For the Eastern Corridor alignment, a Lower Roberts Island launch shaft concept presented at the SEC meetings shows the massive launch shaft complex straddling Black Slough near Holt. This site includes a potential barge landing immediately upstream of Windmill Cove and new haul and access roads and a rail spur on the San Joaquin River banks opposite Buckley Cove Park, near the River Point Landing Marina, Buckley Cove boat launch and home to the Stockton Sailing Club and Delta Sculling Center. Boaters accessing the San Joaquin River from these locations and from Whiskey Slough marinas such as Tiki Lagoon and kayakers to destinations such as Mandeville Tip would all experience a highly altered and industrialized landscape that would be inconsistent with San Joaquin County-designated scenic corridors and roadways. The Byron launch shaft site at Clifton Court Forebay pumping station would result in even greater impact on views from scenic Byron Road due to the landform alteration involved in constructing the proposed 750-acre surface area Southern Forebay. The walls of the proposed forebay would be constructed from some 5 million cubic yards of tunnel material. What cannot be used in immediate onsite construction at or near each of the launch sites would be stockpiled for eventual removal. The area required for storage depends on several factors including the TBM speed, production of tunnel material, and height that the stockpile could be –or on how quickly it could be transported to other re-use locations such as in levee upgrades or subsidence remediation. Examples provided by the DCA in SEC presentations based on 10-foot high stockpiles would require 240acres just for the stockpile at each launch shaft site. Clearly the visual impact and its effect on surrounding communities like Discovery Bay, Byron, Mountain House and Tracy will be massive and lasting.

729	Erik Vink Delta Protection Commission	Reception and Maintenance Shafts. Based on presentations at the SEC meetings, the Sacramento River intakes would also be the site of reception shafts for the tunnel boring machines (TBMs), with maintenance shafts constructed at a range of intervals from two to five miles between the Launch Shaft and the reception shafts, depending on the final design. With construction and operation of the reception and maintenance shafts for either the central or eastern alignment, the visual impacts would mar the Delta legacy communities of Locke, Walnut Grove and potentially Thornton. While reception shafts could and should be removed and their sites restored after construction is complete, as reported at SEC meetings some maintenance shafts could remain. To meet projected sea level rise impacts, these shafts would be constructed with concrete walls 30 to 50 feet high, likely rising higher than existing levees. The shafts would have lasting impacts on the landscape, and without careful planning and design could end up looking like oversized gopher mounds. Maintenance shafts for the Central Corridor alignment driving to or from a Bouldin Island Launch shaft would potentially impact views enjoyed by recreational boaters and by visitors to Tower Park Marina. Tranquil Staten Island fields that provide opportunities for viewing sandhill cranes may also be affected.
729	Erik Vink Delta Protection Commission	Transportation. Finally, transportation logistics is a key consideration in the siting of the launch shafts. According to materials presented at the SEC meetings, for a 6,000 cubic feet per second (cfs) tunnel, deliveries of tunnel liner segments by truck could require 25 trips per day every 25 minutes for ten hours per day over 25 days. By rail car that could be reduced to 20 rail cars or 2000 ton barge, every 3 to 5 days. Throughout the construction period, the commotion of this level of trucking or railroad traffic would degrade the tranquil, scenic attributes of affected Delta landscapes.

729	Erik Vink Delta Protection Commission	Recommended Visual Impact Analysis Approach: Lessons Learned. The BDCP/ WaterFix EIR utilized an approach to visual analysis that combined the three most-accepted visual assessment methodologies used by Federal agencies including the Federal Highway Administration, Bureau of Land Management, and USDA Forest Service that have overlapping assessment principles. A qualitative analysis combined with a quantitative analysis of simulations was used together with narrative descriptions of how the visual environment would be altered. However, simulations could have been more meaningfully used to convey the effects of change on the landscape. To complement the EIR's narrative, impacts should also be portrayed though simulations of scenic conditions both during and after construction from a variety of Delta resident and visitor perspectives. Views from recreational waterways, including portions of the Sacramento, Mokelumne, San Joaquin, Middle, and Old Rivers affected by construction and from Whiskey Slough should be portrayed. This analysis should also portray drivers' views from affected portions of Highway 160, River Road, and locally designated scenic routes and corridors. DWR should work closely with the affected Delta communities to map and characterize the baseline visual landscape, drawing on existing community planning priorities and elements of the natural, historical and cultural experience to establish threshold visual quality objectives for the communities and for the natural and farmed landscapes. Such objectives should then be used to develop measures to minimize outright visual damage as well as the potential for incremental physical deterioration over the course of the construction timeframe. For example, during EIR development and continuing through the design phase, DWR or the DCA should work with the communities on the design of project features that will remain on the landscape, such as the potentially 30 –50-foot high tunnel shafts. Like the CA High Speed Rail project, DWR and/or DCA could work with communities to develop aesthetic guidelines for project elements, both temporary and permanent, that provide contextual design responses to site-specific or unique conditions, or "context-sensitive solutions". Context sensitive solutions mean structural aesthetics must respond to local settings with concern for the human scale, building scale, and the vantage points from which the structures will be viewed. Design principles should include the requirement that the structures enhance local environments and community context to the maximum extent feasible. Especially along Highway 160, the River Road, and local scenic routes and corridors, landscaping could be used to visually integrate project structures into the local context with plantings that recreate the natural or agricultural setting into which they are placed. The aesthetic design of project structures, in combination with landscape and urban design that serve the local community can create a positive contribution to the surrounding visual context and minimize the potential for physical deterioration. If tunnel material is suitable for reuse on areas that will be returned to farming, then the EIR should assess the feasibility of using it to gradually contour slopes surrounding the maintenance shafts, especially when highly visible from heavily travelled roads or locally designated scenic routes and corridors, to minimize abrupt discontinuities in the landform. Using tall crops, such as orchards, to shield maintenance shafts from view should also be considered where soils are suitable. High voltage power lines, batch plants, and other intrusions should be removed when construction is complete. Local government general plan policies that protect scenic routes and corridors also include provisions that suggest potential

		mitigation measures: maintaining agricultural land in farming use, sign controls, limiting roadway improvements to protect scenic corridors, placing riprap on levees no higher than the average annual high water, and maintaining natural roadside vegetation. Where unavoidable visual impacts remain, the Delta Plan MMRP requires "compensatory mitigation for visual or aesthetic resources by providing improvements to areas of existing diminished scenic quality". A potential example that should be examined with local communities could be a façade program to upgrade deteriorating storefronts or buildings in legacy communities or other visitor destinations affected by the project.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must show how visual and noise disturbance, as well as construction-related impacts on the District, the Mission of Clarksburg Fire, and District property, will be minimized.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must analyze whether, and how or how-not, the pre-construction, construction, and operations and maintenance of the Project will have a substantial impact on the views from and operations, fundraising, rehabilitation, reconstruction and reuse of the Old Schoolhouse would substantially impact the Schoolhouse Project.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must show how visual and noise disturbance, as well as construction-related impacts to the Old Schoolhouse and the Old Schoolhouse Project will be minimized.
822	Karen Coffee	Re Property located at 36560 Riverview Drive, Clarksburg, CA 95612. Show how visual and noise disturbance, as well as construction-related impacts to me and my house will be minimized.

Table D-29. Comments Regarding Cultural Resources

Letter	Commenter Name, Affiliation	Comment Text
15	Ray Teran Viejas Band of Kumeyaay Indians	The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. If you wish to utilize Viejas cultural monitors, please call Ernest Pingleton at 619-659-2314 or email, epingleton@viejas-nsn.gov, for contracting and scheduling.
115	Susan Simpson	The One Tunnel proposal solves nothing and poses all the same environmental issues. Endless construction/destruction to the most popular waterways. The Historic Communities of Hood, Locke and Clarksburg will become ghost towns after trying to live through the pounding of pile drivers through their front yards.
210	Anna Powell	Acknowledge fiduciary responsibility to protect Tribal Water Rights and Tribal cultural resources, such as salmon, basketry materials, and the tribal fishery
276	Emily Moloney Buena Vista Rancheria of Miwok Indians	Consider cultural resources. Utilize tribal knowledge to inform the project footprint as to eliminate disturbances to cultural sites. Have monitors on the ground to make sure that during ground-disturbing activities, no cultural resources are impacted.
445	Rosie Clayburn	So my name is Rosie Clayburn. I come from the Village of Yurok which is right along the Klamath River. My family's lived there since time of memorial. I live less than a quarter of a mile from where my family has come from. The Klamath River is important to me. It's important to my family. My family's a fishing family, and it's really disappointing to see these projects come again and again that don't take in the cumulative effects of the real damage that it can do. I also serve as the tribal heritage preservation officer for the Yurok Tribe. My whole life, my whole career, everything that I do is dedicated to the culture of my people and protecting those resources. I'm very knowledgeable in AB52. I'm very knowledgeable in the National Historic Preservation Act Section 106. I actually meet the Secretary of Interior standards for archeology, which is pretty rare for a native person to have. So I can do this thing, and I want to know why this is not addressed, why you did not take into the cumulative effects in your APE for the Trinity River, for the Klamath River because we know those are going to impact our cultural resources. Our salmon are our cultural resources. Our sites are our cultural resources. Our fishing holes are our cultural resources. The materials we gather along -- along the river, you see people in this crowd wearing basket hats. Those materials come from the Klamath River, the Trinity River, the Sacramento River. All these rivers where people wear these baskets, those are ceremonial items. We don't just bring those out, but we bring them because they represent that river. They represent the materials, and they represent who we are as people, so yes, I am opposed to this project, and I hope that you guys actually do a good job in the EIR and actually take into account the cultural resources that will be impacted.

450	Mahlija Florendo	I want to thank the Winnemem Wintu as we're standing on their land today, and I just want to acknowledge that. I am from the mouth of the Klamath River, specifically the Villages of Soquel and Quapaw. The Klamath River is sacred to me because it is a lifeline for the indigenous people. The people depend on this river for gathering for ceremony for life. The people who are proposing and funding this project don't understand that this project is genocide on indigenous people, the rivers and the lands. The diversions of these rivers is displacement on indigenous people, all indigenous people because we are all connected by these lifelines. Every river is interconnected. And maybe you do understand what they're doing to indigenous people and indigenous land and water, but we are here as living proof of indigenous resiliency. Living proof of the fight of our ancestors, and we will continue to be here for future generations. We will not be forced to assimilate to a civilization built on capitalism, patriarchy and genocide. We are these rivers, and when you displace these rivers, you displace us, and we aren't going anywhere. So to those who are proposing these projects, funding these projects and supporting these projects, you don't have a right to 4 these rivers
459	Jasper Hostler	I'm a 17-year-old kid from Hoopa Valley, and I grew up my whole life just knowing the river is a source of food, life, culture, and just a way in anybody's life, and water should be a basic human right for everybody, not a privilege. And to me that -- when you take our water, it's a punch in the gut to us. And sometimes the scars don't heal because back in 2002 when I was only three months old around 35,000 to 70,000 fish were killed. And to me, that just hurts because I grew up catching fish and looking at them and admiring them, and if you can't give us enough water to support their lives, then why are you supporting us as people because they're living, breathing creatures too, and I just want to say that everybody deserves enough water to function. Fish, people, everybody. And if you don't give us enough water for our dances or everything -- like in our boat dance, if a boat tips over for being too -- for the water being too shallow, that's bad medicine on everybody. A whole village.
462	Thomas Joseph	I'd like to recognize that we are on the Winnemem Wintu ancestral territories and lands and that there is many indigenous nations here represented from the Trinity River and the Klamath River and that we have been able to live in this ecosystem as partners of this environment for a long time. And within the last 200 years this state and this nation has been able to decimate these rivers and these lands. Our southern neighbors are robbing us, and they've decimated our territories. They've decimated our rivers. I want to let Gavin Newsom know that his apology for the atrocities that this state has against its indigenous people's a joke. He cannot apologize in one hand and then steal from us in the other hand. We can't continue to cause genocide amongst indigenous people or destroy their ecosystems. We can't continue to prolong this take, take, take.
464	Kenwani Krowitz	I am here today in the capacity of the Madesi multicultural rep. The WaterFix will only end in destruction. It's not going to fix anything. You can't manage Mother Earth. You'll never be able to mitigate the impact that you've had upon our environment and our people. My Wintu people are not federally recognized. All this water comes from our homeland. We need to keep balance here. These impacts are going to -- they're going to impact your children too. You need to think about that.

466	Joanne Lee California Indian Environmental Alliance	And then on page 11, there's mention of the land management, however, there is no mention of TEK, which is Tradition of the Ecological Knowledge that has been used in order to manage the lands. These tribal strategies should be highlighted and reintegrated into our statewide planning. The stewardship and management of indigenous people globally resulted in carbon sequestration and health climate that we have benefited from until the industrial revolution spiraled us towards the climate crises that we are facing today. On the same page, there's no mention of the two new beneficial uses adopted by the State Water Resources Control Board, tribal subsistent fish consumption and tribal cultural uses as well as commercial and sports fishing, subsistent fishing for general public and the human rights to water. As seen in part two of the Water Quality Control Plan for inland surface waters in closed bays and estuaries of California, tribal and subsistent fishing beneficial uses and mercury provisions, these specific uses are really important to any statewide planning document and should be included in the document every place where beneficial uses are mentioned.
469	Chao-Nuucks Manuel	This is a big part of my life because it's the Klamath and Trinity River, and that's all I know. My great grandma walked up and down that river, and I appreciated her stories. My great grandma told us about our Yurok language. Also, the 2002 fish kill filled the banks of the river, and our tribes and our families were broken and devastated. I'm just wondering why you would want to propose something without having any information from any of the tribes that live in the area and would be affected if your plan does not work out the way you want it to.
477	Janice Powell Mayor, City of Shasta Lake	Important to acknowledge that we're holding this gathering on traditional Wintu homeland, and we need to respect the indigenous people.
478	Jason Reed	I'm a Hoopa Tribal member of Hoopa Yurok descent. I'm here representing Big Klamath Basin and my people of Hoopa, Hoopa Tribe as well. I want to talk a little bit about the 2002 fish kill. I was there. I was getting ready to catch the bus to go to school when a local hydrologist came up to me and asked me if I'd been to the river and seen that fish kill. The fish are relations, and just overnight I had 7,000 of my relations killed over decisions that, you know, were made by people in your guys' position, and my inherent responsibility after that is to be -- to be a manager, a steward of this land. You know, that's my inherent responsibility. You want to talk about that fish kill and the biological impact it had on -- it had on our waters, well, the social impact it had on our people, the mental, the spiritual, the cultural, that is all very live in our people. Talk about mental illness, suicide, depression, this is what you guys would be doing by approving these tunnels. The social impact that it will have on our people is detrimental. It's a part -- it's an active genocide, and if you guys want to be part of that, have your names under that, then, I mean, that's the decision you guys make, but I'm sure your guys' ancestors worked very hard to get you guys in the positions where you guys are at right now. That's what we're here to -- our ancestors fought very hard for us to be here today, and we will not sit by and let you guys do this to our land no more.

481	Rain Scher	This project is unsustainable, and there is no amount of changes that you can make to this project to make it sustainable. There's no way that you can take water from up here (Northern California) and send it down there and have any kind of life continue. Fundamentally speaking, policy speakers tend to look at indigenous land management practices as knowledge of the past, and there is no way that we can continue to live on this land without acknowledging that indigenous people are not just knowledgeable about what happened here in the past, but are most acknowledgeable about how to adapt to conditions on this land. There is no way that life will continue on this land without following the leadership of the indigenous people who have been protecting, preserving and living interdependently on this land for thousands of years.
482	Chief Sisk Winnemem Wintu Tribe	They built the Shasta Dam, and they covered up 26 miles of our sacred villages, grave sites, sacred places, places where our people grew up and lived, and we -- we look now at the poison at the bottom of that lake. The arsenic, the copper smelter mines that are at the bottom of that lake that's being transported to people unknowingly of that water, what's in that water. Because the fish are already poisoned with mercury in the lake, but nobody talks about it. There's already a study on it, but nobody talks about it. And they took that water even though we hold first in time water rights. We still hold first in time water rights. Because you know what, we're not under the BIA. We are unrecognized wild Indians still of the McCloud River. You have not adjudicated our water rights, timber rights or anything else or the land, so we own all of those things still. The studies about digging up the Delta, the results of the science on the arsenic, mercury, soil slurry lies also where the Miwok Village sites, sacred sites, there's no studies on the outtakes. What are you going to do when you come across those things? How do you know if the Miwoks have decided to meet with you about those things, but you will -- you will find them because all around the Delta was filled with Indian villages.
483	Kylee Sorrell HUHS Water Protectors Club	I'm a proud member of the Hoopa Valley Tribe and a very proud member of the Water Protectors Club. I'm here to stand before you to tell you how wrong this really is and for the people that have lived and that do live on the river and how this is going to affect all of us in this room. Most people know the river as a sacred place and for me I know as a healing place, a place for fun and a place of a resource of food, and to take it away from a lifestyle from a large amount of people is cruel. Show the Trinity River. Show the rivers when you're going to do something to the Trinity. Show on your maps or we see something -- you have something to hide. Know while I'm here I'm not letting my river, the Trinity River, or the rivers and The Rivers to be harmed.
484	Raven Stevens We Advocate through Environmental Review (WATER)	This project must take into consideration how past policies have failed tribes, the environment, fish, people, and all who need water to survive. Have we learned nothing from history? The destruction of tribes by genocidal policies, we've seen that.
484	Raven Stevens We Advocate through Environmental Review (WATER)	Having this hearing today is not about your agency just checking off the box and saying oh, now we're done. We cannot continue with the short-sidedness that has gotten us into this mess. In order to make real change, your agency must always consult, learn from and follow indigenous leadership.

485	Atta Stevenson California Indian Water Commission	I am a member of the California Indian Water Commission. We have been battling these water before DWR became in existence. One of the reasons that I'm here to talk a little bit about the California Indian Water Commission, we hereby strongly oppose the Delta Conveyance Project. It appears that the water resiliency proposal and the sites reservoir and the voluntary agreement do not give credence nor even acknowledge traditional known -- traditional knowledge, historical data or salmon sustainability for the increased water diversions from the Trinity, Klamath and Sacramento rivers. Diminished water conveyance from northern sources to Southern California will only create alarming already existing crises in several aspects. Tribal subsistence depends on a healthy salmon run, thus sustaining ceremonial and traditional stewardship, fishing techniques, songs and stories that keep salmon sacred. I want to say that if the governor chooses to decide to go ahead with this, it is cultural genocide for all of our people in the north state. Cultural genocide because we have songs and dancers -- dances that reflect the sacredness of water, the spirit of our salmon, and when they no longer happen, we no longer happen. It's as simple as that.
487	Malissa Tayaba	I'm a tribal member from Shingle Springs Rancheria. I'm from the Sacramento River. Today I came to express that this project will have a negative effect on my tribe and other Delta Tribes. This project will impact our sacred sites gathering areas, ceremonial villages, and even burials would be destroyed and disturbed. I am a weaver. That is how I am connected to the water. So where this project is proposed would have a major impact on our gathering areas. My tribal people want to know what will happen to our food? What about the plants and animals and why haven't they been considered? Tribal people want to know how you will bring the salmon back.
491	Vernon Wilson	I don't think our tribe was actually notified. I accidentally came upon this notice through one of the local papers in my community, so that right there is wrong. I have friends and relatives that live on these rivers, and they depend on these rivers, and it's pretty sad that, once again, you know the indigenous people have to come last. It should be addressed, and it should be put forward to the indigenous people of these lands that it's going to affect the most, and they should be the decision makers. They should say yea, nay, bad idea, go somewhere else, get your own water from somewhere else because a lot of people -- when I was a little boy, I was taught to if you approach the water, that is a living thing, that is that you tell it what -- who you are, where you're from, your intentions. And if it's the headwaters of a creek or a river, then you explain, you know, who you are. I'm the people of this land. We've been living together for ten thousands years. And at one time we had a perfect system here, and that's when the indigenous people weren't in control of it, but they were in sync with it, you know, so that's -- that's what it needs to go back to because we've done it -- we've done it your way. It's been forced upon us, and like my friend Atta said, this is just another form of genocide.
523	Kristen Olner	Consider cultural history.

542	Bruce Campbell	Thoroughly analyzing the DCP in terms of "tribal cultural resources" would need to evaluate impacts (including cumulative impacts) on current Native Americans as well as their other species "relatives" IN THE WATERSHEDS THATWOULD BE IMPACTED BY DIVERTING THE PUBLIC TRUST RESOURCE KNOWN AS WATERAWAY FROM THE WATERSHED WHICH NATURE CARVED AND INSTEAD TOWARD THEPOWERFUL INTERESTS OF THE CENTRAL VALLEY. Seriously evaluate what archaeological and cultural resources are being impacted in the Delta area construction zones as well.
571	Karen Jacques	The EIR should analyze impacts on cultural and archaeological resources with the recognition that parts of the Delta include known historic or potential historic resources that, dependent on tunnel route, may be demolished or seriously damaged.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent will the project's impact on cultural heritage sites in California Delta communities be evaluated by the DWR? Specifically, excellent documentation from Spanish and English language sources exists that the project's intake site north of Courtland was the Miwok village of Ochejamne. The project proposed would also travel through the Miwok lands of the Unisumne and Guaypem villages, and the Yokuts lands of the Tauquimne,Jalalon, Tamcan and Nototomne groups. The project plans to create a fore bay near Mountain House would likely flood the archaeological site of the Tamcan village. Does the DWR care about the heritage of the native peoples of the Delta? If so, how does the project plan to reconcile the potential obliteration of the cultural heritage of Miwok and Yokuts communities in California? How does the project plan to recompense the Central Valley Miwuk community descended from the Miwok and Yokuts peoples of San Joaquin County and the Delta? How does the DWR plan to identify and respect native people's burial sites the project may pass through? Will the DWR evaluate the historicity of other non-native Delta sites affected by the Project?
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	The Area of Potential Effect lies within the traditional aboriginal territories of the Buena Vista Me-Wuk peoples and we are concerned about the potential to disturb burial sites of Me-Wuk Ancestors and the possible likely impact and destruction of cultural resources in the area.
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Despite the depth of the tunnel, there is still potential for impact of cultural resources. Review data supporting Late-Pleistocene/aboriginal habitation. Clearly native peoples were present during most of 250 feet of annual alluvial sedimentary deposit in the Great Valley of California, particularly in the Delta region. Complete a comprehensive ethnohistorical investigation into aboriginal habitation within the Delta region and thoroughly analyze the impacts and mitigation methods needed to accomplish this project.
626	Emily Moloney Buena Vista Rancheria of Me-Wuk Indians	Buena Vista Rancheria of Me-Wuk Indians suggests conducing thorough ethnographic studies to inform activities within the project footprint and develop mitigation strategies to deal with potential loss of cultural resources due to tunnel boring.
627	Nichelle Garcia	The EIR should analyze impacts to California's salmon people, including salmon dependent Tribes along the length of the affected watersheds, as well as coastal fishing communities.

702	Frank Toriello We Advocate Through Environmental Review	Many of the areas impacted by this project also include Traditional Tribal Territories of several Indigenous Tribes. California law requires that AB 52 consultations must be conducted for all affected tribes, including but not limited to the Winnemem Wintu, Yurok and Hoopa Tribes. CVP projects have inhumanely and violently impacted traditional tribes, their territories and Tribal Cultural Resources. This horrific injustice must not be perpetuated in this SWP project.
714	Sheridan Noelani Enomoto Greenaction for Health and Environmental Justice	The EIR should analyze impacts to California's salmon people, including salmon dependent Tribes along the length of the affected watersheds, as well as coastal fishing communities.
720	Eric Gillies State Lands Commission	The Project's NOP indicates that the Project may affect Cultural and Tribal properties within the proposed Project footprint. Commission staff suggest that Tribal outreach be implemented as soon as possible with representatives from Tribal groups identified by the Native American Heritage Commission as having cultural or geographic affiliation in the Project area. Commission staff notes that even if none of the affiliated Tribes has requested notification of CEQA projects, the AB 52 provisions in CEQA require lead agencies to evaluate the potential for the project to impact Tribal cultural resources and avoid such impacts to the extent feasible. Details of Tribal Consultation and outreach, and any mitigation measures agreed to as a result of such Consultation and outreach, should be included in the Draft EIR.
728	Jem Unger Hicks	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe, who takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon (Julie Bongers).
729	Erik Vink Delta Protection Commission	The Delta is culturally significant. In designating the Delta as a national heritage area, Congress concluded that the area's historic, cultural, and natural resources combine to form a cohesive, nationally important landscape. In testimony endorsing the national heritage area's designation, the National Park Service's associate director for cultural resources called the Delta "a hidden gem located at a key geographic and historic crossroads of our country. It is a land of ethnic diversity, innovation, industry, enduring history, and both fragile and robust physical features". Our own exploration of the Delta's cultural significance emphasizes it as an exemplar of the American experience in nature and its multicultural immigrants' pursuit of the American dream, free from the restrictions of more traditional societies, where the good life is possible. These cultural values must be respected.

729	Erik Vink Delta Protection Commission	The Delta comprises a significant cultural landscape. The Delta cannot be reduced to a list of historic buildings and archaeological sites. As defined by the National Park Service, a cultural landscape is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or that exhibits other cultural or aesthetic values. The Delta is a landscape that has evolved through use by the people whose activities or occupancy shaped that landscape, which the Park Service calls a "historic vernacular landscape". Examples provided by the National Park Service fit the Delta areas affected by the project: rural villages; agricultural landscapes such as farms and ranches, including landscapes with a total absence of buildings, and landscapes encompassing linear resources including transportation systems, such as the Sacramento River or the River Road. A district of historic farms along a river may be an example of a significant cultural landscape, the Park Service notes, but the presence of buildings is not required. Scenic highways such as Highway 160are another example of a culturally significant landscape. The Delta, including lands bordering the Sacramento River from Freeport through Sherman Island, adjoining legacy communities, neighboring islands and distributaries of the river, Highway 160, and the rural islands of the south Delta are all integral elements of this important cultural landscape. Its levees and drainage works are reminders of the region's post-Gold Rush reclamation and the efforts of California Debris Commission, an early landmark in national flood control. Its vineyards and orchards today occupy much the same lands as they did 75 years ago. Many of its multi-generational farms are operated from century-old farmsteads. The packing sheds and remnant wharves lining the river developed to transport these farms' products to market. The legacy communities, from Freeport to Isleton, several of which are listed historic districts or contain listed historic buildings, grew to serve the region's commerce and became home to Asian and European immigrants who worked in Delta farms and agricultural businesses. Asian New Year celebrations, Portuguese festas, Juneteenth commemorations, and other ethnic festivals, as well as Courtland's Pear Fair and other celebrations of agriculture, demonstrate these cultures' continuing vitality. Railroads and later Highway160and other roads, with their assortment of historic swing and lift bridges, extended into the region with the advance of trains, cars and trucks, bringing anglers, boaters, and other recreationists. The resulting Delta landscape, observed landscape architect Frederick Law Olmsted Jr.in his 1928 report to California's State Park Commission, "commanded delightful views of the river and its margins and of miles of beautiful orchards and farming lands outside of and below the levees....Along the course of this great system of waterways, levees, and roads there are numerous delightful spots...and the route as a whole is in effect, even at present, a river parkway on a vast scale, of great landscape beauty, and enjoyed by thousands of people". This is still an apt description nearly a century later. In recognition of these charms, Highway 160and Sacramento County's River Road are designated as a State Scenic Highway. Local routes and corridor have been similarly recognized by Sacramento, San Joaquin, and Contra Costa counties. Given these historic landscape resources, whose importance has been recognized by Congress, U.S. Department of Interior, National Park Service, State of California and local governments, the EIR should protect the Delta as the culturally significant landscape that it is, rather than limiting its impact assessment to only archaeological sites and individual historic structures and

		districts. Measures to avoid or reduce damage to these resources should be consistent with the Secretary of the Interior's Guidelines for Preserving Cultural Landscapes.
729	Erik Vink Delta Protection Commission	Strengthen protection of historic and archaeological sites. In addition to protecting cultural landscape resources consistent with the Secretary of the Interior's Guidelines, measures to avoid or reduce damage to historic building and archaeological sites should be strengthened from those proposed in the BDCP/WaterFix EIR. Representatives of California native Indian tribes should be consulted regarding protection of archaeological sites as should local Delta historical societies, museums, Locke Foundation, historians, and community groups when historic resources are affected. Dr. Robert Benedetti's testimony in Sacramento County's appeal of the CA WaterFix Delta Plan consistency certification should also be reviewed to identify historic resources at risk from tunnel constriction. All measures included in the Delta Plan MMRP 10-1 through 10-4 should be used, as applicable. If historic buildings must be acquired, they should be adequately protected, including stabilizing walls and windows, controlling mold and other damage throughout the construction period, and then rehabilitated consistent with the Secretary of the Interior's Standards for Rehabilitation for reuse upon the project's completion. A useful measure from the mitigation plan for San Francisco's central subway is monitoring vibration of historic structures adjacent to tunnels to ensure that historic properties do not sustain damage during construction. Contract documents should specify maximum peak vibration levels. If at any time the construction activity exceeds this level, that activity must immediately be halted until an alternative construction method can be identified that results in lower vibration levels. Inadvertent damage to historic properties or historical resources must be repaired, consistent with a written general protocol for inadvertent damage to historic architectural resources and a listing of specific properties that should be the subject of an individual plan because of their immediate proximity to the project, as provided in the High Speed Rail Authority's mitigation plan. Inadvertent damage from the project to any of the historic properties or historical resources near construction activities should be repaired in accordance with the Secretary of the Interior's Standards for Rehabilitation. Another useful measure from the High Speed Rail Authority's EIR is providing interpretive information regarding specific historic properties or historical resources affected by the project, including brochures, videos, websites, study guides, teaching guides, articles or reports for general publication, commemorative plaques, or exhibits.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The Old Schoolhouse is located at the intersection of South River Road and Netherlands Ave., on commercially zoned property, and is a short distance from the proposed possible furthest upriver intake facility as described in the NOP. The Old Schoolhouse is a property of significant cultural and historical importance and resource to the Delta and California, and the Schoolhouse Project is a project to preserve important history, of great significance to Clarksburg, to the Delta, and to California. It is the policy of the State of California and of the U.S. to preserve and protect historical properties such as the Old Schoolhouse.

732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	Provide attachment: copy of a current newsletter which further describes the Old Schoolhouse Project, its status, and its future development.
735	Regina Cuellar Shingle Springs Band of Miwok Indians	Our Tribe's ancestral homelands include territory that spans north up the Sacramento River from the Delta with village sites located on both the east and west banks, to the Feather and Bear rivers, and east into the sierras. According to the information included in the 2016 Final EIR of the California Waterfix Project, anthropologists, such as Kroeber, list several ethnographic Nisenan villages documented along the eastern and western banks of the Sacramento River and along the northern and southern banks of the American River, with additional village sites along the Cosumnes and Feather Rivers. Along with Maidu and Konkow, the languages of the Nisenan people's northern neighbors, the Nisenan language forms the Maiduan language family of the Penutian linguistic stock (Shipley 1978: 83). Wilson and Towne (1978) defined three main subgroups within the Nisenan tribe: Northern Hill Nisenan, Southern Hill Nisenan, and Valley Nisenan. The Valley Nisenan resided adjacent to the northernmost extent of the Plan Area before Euro American contact. Valley Nisenan located their permanent settlements along the riverbanks on elevated natural levees near an adequate food and water supply, in fairly open terrain, with southern exposure preferred (Johnson and Johnson 1974; Beals 1933). Villages ranged from "tribelets" of small extended families consisting of 15 to 25 individuals to larger communities with more than 100 people (Kroeber 1925). Village sizes ranged from 3 houses up to 40 or 50. Houses were domed structures covered with earth and tule or grass. Brush shelters were used in the summer and at temporary camps during food-gathering rounds (Kroeber 1925:407–408). Larger villages often had semi-subterranean dance houses, which were covered in earth and tule or brush and had a central smoke hole at the top. Other common village structures were the sweathouse, used for curing and purification, and the granary, used for storing acorns (Wilson and Towne 1978: 388–389). The smallest Nisenan social and political unit was the family. Each extended family was represented by a family leader, who was called to council by a headman. The headman of the dominant village in a cluster of villages (tribelet) had the authority to call upon the aid of surrounding villages in social and political situations. The headman also served as village adviser, directed special festivities, arbitrated disputes, and acted as an official host (Wilson and Towne 1978: 393; Beals 1933: 360). Early Nisenan contact with Europeans appears to have been limited to the southern reaches of their territory, beginning in the early 1800s. Unlike the Valley Nisenan, the groups in the foothills remained relatively unaffected by the European presence until the discovery of gold at Coloma in 1848. In the years following the gold discovery, Nisenan territory was overrun by settlers. Gold seekers and the settlements that sprang up to support them were nearly fatal to the native inhabitants. Survivors worked as wage laborers and domestic help and lived on the edges of foothill towns. Despite severe depredations, descendants of the Nisenan still live in the northern Central Valley and maintain their cultural identity (Wilson and Towne 1978: 396–397).

774	Don Hankins California Indian Water Commission	Tribal planning is inclusive of past, present, and future generations. This planning is retrospective to prior generations impacts and into the future. Thus, the project analysis should look at this Delta landscape prior to European invasion to 200 years from present. Specific analysis (inclusive of past projects prior to existence of consultation policies and environmental impacts) should focus on the following areas: Impacts to sacred sites, traditional cultural properties, and traditional cultural landscapes (all of which occur within the footprint of the project, and in order to understand would require government to government consultation with us).Not all of these features may be on file with the Native American Heritage Commission. Diversions impacts to Indigenous water rights and self-determination (e.g., Winters Doctrine and prior appropriations). Implications to self-determination and sovereignty pursuant to policies including HR 93- 638, B-10-11 and N-15-19. Analysis of solastalgia and intergenerational trauma to Tribal individuals/communities Long-term survival and recovery to abundance of ecocultural species. Water sustainability and resilience given climatic variability. Traditional Indigenous lifeways and economy. The impacts to species needs to be comprehensive of the food web from source to sink (i.e., mountains to sea), as all of these species are likely to be impacted.
774	Don Hankins California Indian Water Commission	We suggest DWR work in cooperation with our organization to complete analysis of the ecocultural impacts through use of the Mauriometer, which is a heuristic model for assessing project impacts on ecocultural properties.
783	Mark Miyoshi Winnemem Wintu Tribe	Salmon and other life of the Sacramento River and the Delta have suffered the same fate as the Winnemem people, with Chinook now nearing extinction and the River itself channelized, polluted and over allocated. The Delta Conveyance now threatens to divert even more Sacramento River and Trinity River water to Southern California agricultural and municipal water districts, threatening the final death of the Delta and shutting off the last meager pathway for Salmon to travel from the Pacific to Winnemem territory and back.
793	Rebekah Olstad	I am concerned about the project's impact on indigenous people. Our government cannot ignore their requests and continue the actual and cultural genocide of their people. It is also unacceptable to try to move forward such a huge project that has such a large impact on people's lives when many communities cannot meaningfully engage with the commentary process because they don't have high speed internet and cannot attend meetings in person because of social distancing requirements. I agree with the following comments: -If the California governor’s office does not have the free, prior and informed consent of the Indigenous people, then he has no right to build the tunnel. No consent, no tunnel!
793	Rebekah Olstad	The EIR (Environmental Impact Report) should analyze impacts to California’s salmon people, including salmon dependent Tribes along the length of the affected watersheds, as well as coastal fishing communities. As required by the UN Declaration on the Rights of Indigenous People, the Department of Water Resources must seek out the free, prior and informed consent of the tribes before greenlighting this project.

804	Don Hankins, Ph.D.	Tribal planning is inclusive of past, present, and future generations. This planning is retrospective to prior generations impacts and into the future. Thus, the project analysis should look at this Delta landscape prior to European invasion to 200 years from present. Specific analysis (inclusive of past projects prior to existence of consultation policies and environmental impacts) should focus on the following areas: Impacts to sacred sites, traditional cultural properties, and traditional cultural landscapes (all of which occur within the footprint of the project, and in order to understand would require government to government consultation with us). Not all of these features may be on file with the Native American Heritage Commission. · Diversions impacts to Indigenous water rights and self-determination (e.g., Winters Doctrine and prior appropriations). · Implications to self-determination and sovereignty pursuant to policies including HR 93-638, B-10-11 and N-15-19. Analysis of solastalgia and intergenerational trauma to Tribal individuals/communities · Long-term survival and recovery to abundance of ecocultural species. · Water sustainability and resilience given climatic variability. · Traditional Indigenous lifeways and economy. · The impacts to species needs to be comprehensive of the food web from source to sink (i.e., mountains to sea), as all of these species are likely to be impacted.
822	Karen Coffee	Re Property located at 36560 Riverview Drive, Clarksburg, CA 95612. Located on the Sacramento River, immediately across from the furthest upriver intake identified in the NOP, the Gothic Victorian house built at this address, my home and permanent residence, is one of only two examples of this type of architecture in a several county area. Originally built in 1873 for Civil War veteran, Cornelius Hugaboom, my home served the Clarksburg community, the wider Delta, and residents of and visitors to California at the turn of the century as a hotel, resting and stopping point for recreational and other travelers, fishermen, trappers, visitors and temporary residents. My home is now the oldest remaining house in Clarksburg. Due to its original close proximity to the River Road, the house has been physically moved back twice -- each move precipitated by an increase in the height of the levee or the widening of the road on the crown of the levee. My home is an historical structure and property.
853	Susan Alexander	The EIR (Environmental Impact Report) should analyze impacts to California's salmon people, including salmon dependent Tribes along the length of the affected watersheds, as well as coastal fishing communities
884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - Horrible impacts on the historic legacy communities in the north where they are still planning on locating the intakes practically on top of those communities.
889	Todd Scruggs	Horrible impacts on the historic legacy communities in the north where they are still planning on locating the intakes practically on top of those communities.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft.: Horrible impacts on the historic legacy communities in the north where they are still planning on locating the intakes practically on top of those communities.

973	Laurie Yglesia	- Horrible impacts on the historic legacy communities in the north where they are planning on building the intakes practically on top of those communities.
905, 906	Mark & Linda Lambert	4). Horrible impacts on the historic legacy communities in the north where they are planning on building the intakes practically on top of those communities.
1004	Blythe Reis and Mark DuPont	The EIR should analyze impacts to California's salmon people, including salmon dependent Tribes and coastal fishing communities.

Table D-30. Comments Regarding Transportation

Letter	Commenter Name, Affiliation	Comment Text
48	Libby Lucas	Request you also address these specific areas of concern: Waters of U.S. designation to Sacramento River assure basic rights of passage and use which need reaffirmation in scoping study
160	Diane Kirkham	Commenter cites the following reasons for concerns regarding the Launch Shaft Site A for the Central Corridor for the proposed Delta Conveyance Project as being currently discussed by the Delta Conveyance Design and Construction Authority. (I believe that this is now also the preferred site for Launch Shaft Site A for the Eastern Corridor as well.) 2. Traffic. The site, at an ALREADY busy intersection, will negatively impact traffic delays on both Franklin Blvd and Twin Cities Road due to drastically increased volumes of construction vehicles and employee vehicles. Furthermore, traffic delays are likely to be exacerbated by heavier and more frequent loads on the main line of the adjacent railroad and by newly added railroad spur or spurs. This tangle of traffic will not only negatively affect local residential and agricultural traffic, but also, employees of the Rio Cosumnes Correctional Center that use this route, as well as the many residents of Galt and Herald that commute to the Bay Area and Sacramento via Twin Cities to I-5.
162	Gene Beley	The Delta roads are already very dangerous, due to Google apps rerouting traffic onto Highway160 and many deaths are occurring. So just add hundreds of trucks and construction equipment for a total increase in fatalities on those roads and ask how many of you current government employees pushing this project will be responsible for those deaths?
269	Jeff Durbin	In Clarksburg, trucks driving down the level shake the levees and you can feel it in a boat in the river. If the project goes through, lower the speed limit on the levees to avoid trouble.
274	Mariah Looney Restore the Delta	What will be the impacts from construction? There will be heavy truck traffic to all major construction sites competing on I-5 and Highway 4 major arteries. Right now, 30,000 people commute from Stockton to Sacramento, and 40,000 to the Bay area. Where are the regional traffic studies? This will hurt and not help our local economies, and the few hundred jobs from tunnel construction will not offset this economic hit.
282	Tim Stroshane Restore the Delta	Transportation impacts must be based on a full and complete project description, including the provision of all construction materials and logistics for the tunnel construction period.
337	Elaine Baret Little Manila Rising	If we move forward with this project, there will be heavy truck traffic to all of the major construction sites competing on the I5 Highway corridor. And right now, 30,000 people commute from Stockton to Sacramento, and 40,000 and more to the Bay area. Where are the regional traffic studies?

346	Mariah Looney Restore the Delta	The new eastern alignment released by the DCA relocating the Delta tunnel just a few miles east of the Port of Stockton and much closer to the entire city, the DCA plans to run barges, trains and trucks at full capacity from the port to the north Delta for construction. And while hundreds of trucks a day making new runs from the port is being sold as jobs, it can actually interfere with the commutes for thirty thousand residents who already drive daily to Sacramento, and push business away from downtown Stockton, which is in the kind of a revitalization period.
349	David Scatena	I am concerned about the increased truck traffic throughout our area.
363	Susan Caston	I live on River Road; concerned about potholes, access to her driveway
380	Dave Stirling	Concerned about impacts to roads and bridges.
434	Tom Slater	The previous EIR for the WaterFix indicated that construction traffic for the project would increase traffic to as many as 700 to 800 vehicles per hour on some of our roads and levees. This is clearly something the CEQA document should consider unacceptable.
543	Greg Knoblich	Gridlock that will occur on Highway 4 along with damage due to construction traffic will cause major, ongoing disruptions to lives of residents in the Delta.
544	Betty Miller	Gridlock that will occur on Highway 4 along with damage due to construction traffic will cause major, ongoing disruptions to lives of residents in the Delta.
549	Maggi Baum	The plan shows the road being moved and blocked off for a time period. Will that allow us to still be able to harvest and transport our crop? Pears are time sensitive on the market and can't sit around for hours waiting for the road to open. Also I would like to know where the road is moving back to. How far will it move? Will the levee move with it? How will the tunnel affect traffic?
552	Nicole Suard Snug Harbor Resorts	Transportation impacts for construction could result in even more economic damage to the Delta area recreation and agricultural resources. I have reviewed the preliminary maps and planning materials distributed by the DCA, and I do acknowledge that DWR planners seem to be trying to reduce impacts to Delta area roads by location the construction access road to the east, off of highway 5.However, impacts to navigation from barge travel, and from blockage of Highways 12 and 160 from repeated bridge openings has not been resolved. Transportation impacts to the North Delta during the intake(s) construction timeframe has also not been adequately addressed.
558	Edward Schnee	The gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta
560	Bradford Pappalardo Steamboat Resort	The project is so massive that the number of trucks and barges necessary will cause impossible traffic and congestion problems throughout the Delta.

560	Bradford Pappalardo Steamboat Resort	The most important to me as a resort owner is the traffic and transportation problem through the Delta. All of my boat tenants come from out of the area; from the Bay Area; Marin County, and Central California. They come long distances to avoid and escape the very traffic and congestion that will occur here. Well, they won't come here if they have to spend hours in traffic to do so. This is supposed to be a place to relax. There are traffic issues from the construction on Interstate 5. We are already experiencing significant traffic problems in the Delta with commuters using Delta road ways to go around the traffic on I-5. It is already happening and observable. Road related deaths in the Delta are on the rise. And, the traffic issues related to the project will not only affect the Delta, but Elk Grove, South Sacramento, Galt and all surrounding communities, whose surface roads will also be used to avoid the traffic and commuter problems related to the project. Past studies of this project show the traffic impacts of construction on I-5 exceed the level of service at the peak commute times northbound and southbound out of Elk Grove. People in Elk Grove will not be able to get to and from work in any reasonable amount of time. Jobs and lives will be negatively impacted for very large community of people and must be mitigated. We also need to address emergency response times and the need to protect people's safety and health problems with local providers due to increased traffic.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent will the DWR and DCA analyze the economic impacts of increased trucking on delta roadways? How will the increased traffic of trucks, sometimes in excess of 200 trucks per day, affect the lives and livelihoods of communities in Sacramento, San Joaquin, Contra Costa, and Alameda Counties who rely on highways in the secondary and primary zones of the Delta for work?
598	Bill Emlen Solano County	Based on available information, the Project may include constructing approximately 40 miles of a large diameter main tunnel along one of two potential corridor routes, launch and retrieval vertical shafts, intake and outlet facilities, two forebays, a pumping plant, connection tunnel reaches, and numerous construction and staging areas and ancillary facilities along the proposed construction corridor. The proposed Project, including construction and staging areas, forebays, and pumping plant facilities, could disturb several thousands of acres to construct and operate the facilities. During the estimated 13-year construction time-frame, levee roads, railways, and waterway barges all may be used. It is estimated that hundreds of construction trucks, rail, and/or barge and worker trips will likely be needed every day throughout the multi-year construction project timeframe. Using barge and rail may reduce truck traffic impacts on roads and levees but may cause other impacts from traffic delays associated with rail road crossings, impacts to boating and water way access, and levee impacts due to heavy traffic, wave action and increased barge traffic, along with effects on air quality and excessive noise. In addition, the Project construction and operations may impact the few key highway routes within and adjacent to the Delta, which serve Solano and neighboring Counties, that provide not only economic and emergency access, but also service the Travis Airforce Base. The EIR should analyze the impacts of the Project construction and operations will have on major transportation routes, including loss and relocation of roads, and access and emergency response disruptions.

610	Henry Kuechler Reclamation District No. 2060	Construction of the project will have severe transportation impacts on the general public and landowners. Routes need to be planned and provided to ensure no disruption in vehicle travel times for emergency response vehicles and schools. Propose mitigation for an and all traffic impacts, including building public access bridges and roadways, and paying to maintain in perpetuity.
612	Warren Bogle Reclamation District 150	Construction of the project will have severe transportation impacts on the general public and landowners. Routes need to be planned and provided to ensure no disruption in vehicle travel times for emergency response vehicles and schools. Propose mitigation for an and all traffic impacts, including building public access bridges and roadways, and paying to maintain in perpetuity.
612	Warren Bogle Reclamation District 150	Farming operations will be severely impacted during harvest due to increased construction traffic. Many Delta bridges only support one-way traffic, which currently causes traffic conditions in the Delta. Increased construction trucks will exacerbate this issue, disrupting agricultural operations and commuting.
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Conduct analysis about whether, and how or how-not, traffic patterns and changes caused by the Project will impact the Residents, each of the Residents, and the Clarksburg Community and each significant part of the Clarksburg Community.
623	Bob and Carolyn Graham	The Central Corridor will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
624	Gabrielle Tetreault	The Central Corridor will result in huge economic losses, if not bankruptcy, to boating communities, marinas, and boating-based mom & pop businesses due to noise and construction through the middle of the favorite boating waterways and anchorages.
673	Jan Hagen	Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.

677	Jeff McCormack JT McCormack, Inc..	Expansion of marshlands might also impact on transportation routes, if large areas are flooded with marsh. The Delta Stewardship Council staff was already willing to close down Twin Cities Road altogether, to break down Lost Slough levee and flood north over John McCormack Co.'s Glannvale Ranch and others of Reclamation District 1002, to hook up with Stone Lakes Refuge. That would have diverted cross-State traffic through the Delta from the Bay Area to I-5 and 99 via Walnut Grove-Thornton Rd. That traffic is already an environmental impact on our ranches on Andrus Island, and the whole length of Hwy. 160 from Antioch and Rio Vista's Hwy. 12, connecting Napa Valley, Lodi, and Sierra foothill counties. Google Maps' optimization algorithm finding that Hwy. 160 to Twin Cities Rd. has increased both the volume and speed of traffic in both directions, creating highly hazardous conditions from speeding lines of traffic trying to reach distant cities, and not realizing the poor conditions of collapsing roadways. Volume of truck traffic has badly degraded the road. Similar problems on other levee roads are expected, and costs of accelerated decline should be attributed to this project, and funds included to mitigate road degradation. Transportation impacts are part of the socioeconomic impact analysis, and are the economic impacts on interrupted farming operations, as well as accidents projections, for farmworkers trying to get back onto the levee when highspeed cars are coming around corners.
684	Jeff McCormack John McCormack Co.	Our main access road off Twin Cities Rd. is along that canal. You propose your main central access road to the Launch Shaft site on the northward extension of that road along that canal. So all your trucks will be turning North at the same crossroads off Twin Cities Rd. that we will be turning onto and off of Twin Cities Rd.
684	Jeff McCormack John McCormack Co.	The 20 years of construction activity from Lambert Road down to Dierssen Rd. to Twin Cities Rd. would require upgrading of all roads in the reclamation district, as well as traffic that would interfere with operations, including our harvest delivery to market.
704	Eric Jenks Wilbur-Ellis Company	If a launch site or other Project component near the Twin Cities facility is included in the proposed Project, the EIR should (a) should fully analyze the environmental and related impacts of such Project component, including impacts to traffic and transportation.

704	Eric Jenks Wilbur-Ellis Company	The Twin Cities facility is centrally located to serve the agricultural product needs for growers in the Delta region, the wine-grape growing region in and around Lodi, and farms in southern Sacramento County. If this facility were disrupted or closed, it would cause significant adverse impacts to traffic because local growers in these areas would need to travel much farther for their crop input needs. In 2019, the substantial majority of customers who visited (or took deliveries from4) the Twin Cities facility were within 10 to 25 miles of the facility. As noted above, proximity is especially important for agricultural products because of their size and nature—e.g., large volumes of fertilizer, heavy and bulky equipment—which are not well-suited for transport across long distances. These impacts to traffic and transportation must be considered. In addition, the EIR should consider and analyze any potential disruption to the Twin Cities facility caused by traffic associated with the Project, including any proposed hauling of reusable tunnel material ("RTM"), or other Project-related materials, on Twin Cities Road.5 According to DCA's presentation on launch shaft logistics,6 the potential traffic on roads adjacent to launch shaft sites can be reduced by using barges or trains, instead of trucks, for hauling RTM off-site. Thus, siting launch shafts adjacent to barge access (i.e., on navigable water bodies) would be preferable in order to minimize traffic and transportation impacts.
705	Roger Mammon	During the construction phase of the project what will happen to the fragile Delta roadways?
705	Roger Mammon	How will navigation be affected?
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Costs associated with construction zones must include road and levee maintenance, greenhouse gas emissions, and increased time and costs to residents. Road and levee impacts of the detour routes and not just of the construction zones must also be mitigated. As construction occurs, traffic will use surrounding roads to avoid the construction zone. Before construction on the project starts, upgrades and additional structural support need to be required on all surrounding roads that may be used as detour by residents. Then as the construction progresses, those roads will need to be maintained regularly and when the project is complete, a final replacement of those roads will need to be completed. Failure to address this critical issue will subject the residents and islands to levee failure and potential flooding. Consideration must also be given and addressed for residents who will bear huge additional costs in fuel and wear and tear on their vehicles. While a detour route in the city may only add 1-5 minutes around a single block, in the delta with the rivers and a few bridges, detour routes will cause at minimum, 30 additional driving minutes for most residents. This impact will directly affect residents financially with increased fuel consumption, increased mileage and wear on their vehicles. The project has noted that the number of construction vehicle trips will be potentially 300 per day and have identified that it will create an unacceptable amount of greenhouse gas emissions. We request that the EIR also include calculations and mitigation for all the additional emissions created by residents having to travel around the construction sites on detour routes as well as those directly related to the construction of this project.

715	Daniel Wilson Reclamation District 3	Construction of the project will have severe transportation impacts on the general public and landowners. Routes need to be planned and provided to ensure no disruption in vehicle travel times for emergency response vehicles and schools. Propose mitigation for an and all traffic impacts, including building public access bridges and roadways, and paying to maintain in perpetuity.
718	David Strecker San Joaquin Farm Bureau Federation	Costs associated with construction zones must include road and levee maintenance, greenhouse gas emissions, and increased time and costs to residents. Road and levee impacts of the detour routes and not just of the construction zones must also be mitigated. As construction occurs, traffic will use surrounding roads to avoid the construction zone. Before construction on the project starts, upgrades and additional structural support need to be required on all surrounding roads that may be used as detour by residents. Then as the construction progresses, those roads will need to be maintained regularly and when the project is complete, a final replacement of those roads will need to be completed. Failure to address this critical issue will subject the residents and islands to levee failure and potential flooding. Consideration must also be given and addressed for residents who will bear huge additional costs in fuel and wear and tear on their vehicles. While a detour route in the city may only add 1-5 minutes around a single block, in the delta with the rivers and a few bridges, detour routes will cause at minimum, 30 additional driving minutes for most residents. This impact will directly affect residents financially with increased fuel consumption, increased mileage and wear on their vehicles. The project has noted that the number of construction vehicle trips will be potentially 300 per day and have identified that it will create an unacceptable amount of greenhouse gas emissions. We request that the EIR also include calculations and mitigation for all the additional emissions created by residents having to travel around the construction sites on detour routes as well as those directly related to the construction of this project.

729	Erik Vink Delta Protection Commission	Transportation routes are lifelines. The key modes of transportation that move people and goods in the Delta are roads, water, and rail. Interstates 5, 80, and 580 provide major transportation and trucking routes skirting the Delta. The three major state highways in the Delta (State Routes 4, 12, and160) are typically two lanes, sometimes built on top of levees. Originally meant for lower traffic volumes at moderate speeds, the state highways are now heavily used for regional trucking, recreational access, and commuting. More than 50 bridges, including approximately 30 drawbridges, span the navigable channels of the Delta. Regional rail traffic between the Bay Area and the Central Valley passes through the Delta, as do commuter rail services such as the Amtrak San Joaquin. Two major ports lie in the Delta, the Ports of West Sacramento and Stockton, accessed by the Sacramento River and Stockton Deep Water Ship channels, respectively. The Sacramento channel is 30 feet in depth, and thus is a non-container port. The Stockton channel has a depth of 35 feet and can handle up to 55,000 ton ships fully loaded or up to 80,000 ton ships partially loaded. Several million tons of diversified products are shipped through the Delta each year. Primary cargos in the Port of West Sacramento are rice exports and cement imports. The port can also handle heavy machinery such as wind turbines, steel generators and transformers. The Port of Stockton handles raw and finished goods and has 7 million square feet of warehousing and facilities for handling liquid bulk and dry bulk commodities. According to the U.S. Army Corps of Engineers Waterborne Commerce Statistics Center (WCSC), a total of 898,044 tons of import/export cargo transited the Sacramento Deep Water Ship Channel in 2018. For the same period the Port of Stockton handled a total of 5.2 million tons of import/export cargo and reported a total of 252 ship calls. Both ports hope to expand in the future, which would result in an increase in ship and barge traffic through the Delta. These transportation assets are essential to the region's economic pillars –agriculture and recreation –to the quality of life of Delta residents, and the enjoyment of Delta visitors.

729	Erik Vink Delta Protection Commission	Involve Stakeholders. The Delta is not only a water hub for the state but also a vast multi-dimensional transportation web of freeways, state highways, county and local levee roads, waterways, ports, railways, and the private and public logistics systems that manage them. This web is so important to the larger regional economy that a multitude of stakeholders have a grip on one or more of the supporting threads – county, state and federal agencies, local reclamation districts on whose levees some roads travel, and constituents in many industries all have an interest in Delta transportation and depend on this system to support the function of business, commerce and daily life. To name but a few of these stakeholders, three different Caltrans districts maintain and plan for the Delta's transportation future, in cooperation with three different Councils of Governments (COGs) who represent Delta counties and municipalities in developing Regional Transportation Plans (RTPs) to recommend funding and prioritization of transportation projects and more recently sustainable communities planning. Some counties have transportation planning authorities in addition. The California Highway Patrol (CHP) also has three different districts responsible for highway safety in the Delta. The Delta Officers Intelligence Team (DOIT) convened by the U.S. Coast Guard Station –Rio Vista meets monthly with federal, state and local marine law enforcement, search and rescue agencies such as fire protection districts, and other interested agencies such as State Lands Commission and DBW to coordinate information relative to Delta marine safety and operations. Citizen organizations such as the Highway 12 Association attempt to coordinate with some of these authorities and publicize their activities and projects –especially when it comes to roadway maintenance and improvements.
729	Erik Vink Delta Protection Commission	Account for Pre-Existing Conditions. Traffic congestion and safety is widely acknowledged by all these players to be an ongoing issue in the Delta. Existing congestion on Highways 4, 12, and 160 already impairs travel within the Delta and beyond to the metropolitan areas of the East Bay, Stockton-Tracy, and Sacramento. Accidents are frequent, often fatal, and lead to related hazards such as fires or vehicles in the water. Some safety improvements have been implemented such as installation of "K-rail" in the median of State Route 12, but many more safety projects are a challenge due to the high traffic volumes affected, lack of right-of-way for traffic management, and other unique Delta conditions such as peat soil. Seasonally, safe movement of slow or over-size farm equipment from one location to another is risky. Aging bridges are frequently fully or partially closed for repair and maintenance and ferries may be taken offline, causing significant re-routing or delays of travel.
729	Erik Vink Delta Protection Commission	Rely On the Experts. Successfully avoiding or mitigating transportation impacts to an already over-taxed transportation environment will be difficult. Some transportation and circulation impacts will likely be significant and unavoidable. Addressing transportation impacts will require a construction transportation management system with flexibility and creativity. We urge DWR and/or the DCA to acknowledge the severity of the baseline condition and marshal the knowledge and resources of the local and state agencies that are the most familiar with Delta transportation challenges. Most if not all of these have spent considerable time developing plans and programs to improve conditions for their citizens but may lack the resources to carry them out.

729	Erik Vink Delta Protection Commission	Start With Best Available Data and Science. We again encourage gathering the best available data and science at this early stage to support the analysis in the draft EIR. The land suitability analysis presented at the SEC meetings appears to be assembling some of the data needed to adequately analyze the project impacts. Identifying roads, rails, and barge-worthy waterways is a start. But the EIR must evaluate more than just the factors considered in design and construction planning. The Commission is encouraged that DWR and the DCA have initiated new traffic counts in the past several months. To avoid repeating the mistakes of the BDCP/WaterFix EIR, additional information will be needed about (1) the operational status of ferries and movable bridges affected by project traffic (percentage of time when operations are limited by repairs or maintenance), (2) bridge clearance above water levels and existing channel depths and configurations at proposed barge routes under a range of water conditions (to assess their suitability for barge traffic and impact of barge travel on bridge operations and related highway congestion), and (3) recreational boat traffic on proposed barge routes to aid in assessing impacts to marine safety. Data from traffic studies currently being completed should be shared with local transportation agencies or on the state's Data Portal. It will also be essential for the EIR analysis to start with a through database of Delta-wide transportation and circulation policies, plans and programs at all levels. We highlight here a few of the important data sources, obvious perhaps, but nevertheless noteworthy in the consistency of cross-jurisdictional priorities. The county general plans identify what they can live with, and a survey of all of them quickly shows the high priority for the Delta that each of them sets on: •Linking communities externally to regional, state, international and virtual destinations through safe and efficient transportation networks and high-speed communications infrastructure. •Connecting communities internally through an efficient and safe system of roadways, bridges, transit, bikeways, and pedestrian trails and sidewalks. Facilitating the movement of goods by preserving and improving transportation corridors including road and rail. •Community residents and farm equipment move together safely on well managed and maintained roads. •Including specific transportation and circulation policies to preserve roadway levels of service (LOS) and ensure existing and future operations of important economic hubs. An example of this: Yolo County's policies protecting the Port of Sacramento and its integration with designated truck routes such as State Route (SR) 84 in the transportation of agricultural products to and from the Clarksburg and Delta regions. Clarksburg Road from SR 84 to South River Road is a targeted trucking corridor for improvements to support agricultural transport. •Ensuring gateway entry points for visitors to the Delta region seeking agri-tourism, eco-tourism, cultural and recreational experience opportunities. •Encouraging multi-modal access to alternate transportation to alleviate roadway congestion and enhance the visitor experience. •Including pedestrian walkways and bikeways on bridges or overpasses that are new or modified. •Preserving agriculture and the agricultural economy. •Envisioning strong and vibrant Delta communities whose economies are diverse and serve as a source of food and agricultural commodities; a destination for tourists; and a supply of high-tech and manufactured products. Additional sources should include the current RTPs and other program documents of Sacramento Area COG (SACOG), San Joaquin COG(SJCOG), and Association of Bay Area Governments (ABAG), which represent the Delta counties and municipalities. Thresholds for traffic

		impacts should be developed using not only the most up-to-date methodology from the most recent edition of the Highway Capacity Manual but in close consultation with all three Caltrans districts with responsibility for Delta roads, bridges and ferries –Districts 3,4 and 10. With the traffic count data that DWR is collecting, operational analysis should be completed to help evaluate alternative designs. Recent climate vulnerability assessments completed by the three Caltrans districts should also provide source material.
729	Erik Vink Delta Protection Commission	Account for the Project's Cumulative and Interrelated Impacts. As implied by the foregoing baseline description, either of the project alignments shown in the NOP would exacerbate a multitude of existing transportation challenges. SR 160, 12, and 4 and many county roads would be adversely impacted by increases in any type of traffic. For example, Hood-Franklin Road from Interstate 5 to SR 160 and Lambert Road from Herzog Road to Franklin Blvd are already operating at "Deficient" levels. Increased traffic on the roadways potentially to be used during construction of intakes or construction and operation of the potential Granville Tract launch shaft site, including Hood-Franklin Road, Lambert Road, Twin Cities Road and River Road, would adversely impact public safety in transit to Locke, Walnut Grove, and the Stone Lakes NWR. At least two dozen bridges on the Sacramento, Mokelumne, and Middle rivers, and multiple sloughs would be affected by increased barge, rail and truck transit. New rail spurs or access and haul roads could also interfere with access to farmland. An adequate assessment of the project's impacts on transportation should integrate information on all these interrelated factors affecting congestion and traffic flows.] As suggested in the Land Use section, the EIR should tabulate the acreage and map areas where congestion to LOSD or worse impairs access to properties, including residences, commercial properties, schools and other important community resources.

729	Erik Vink Delta Protection Commission	Engage Others to Mitigate Complex Impacts More Effectively. We recommend a comprehensive approach to transportation impact mitigation, with targeted local avoidance and mitigation wherever feasible. Mitigating transportation impacts will likely be complex, requiring extensive coordination with other entities, each of which has their own pre-existing obligations and responsibilities. These entities range from the school district transportation coordinator to Caltrans, from the CHP and other emergency responders to the residential trash pick-up contractors, from county public works departments to bridge operators. To streamline coordination, DWR and the DCA should consult with SACOG, SJCOG, and ABAG, with the three Caltrans Delta districts (3,4 and 10) and with Caltrans headquarters. Collectively the COGs and Caltrans comprise the transportation managers of the "mega-region" and have the experience to provide practical input on avoidance and mitigation. Caltrans and some of the county agencies may also have encroachment or other permit authority for certain aspects of the project, so their early input would be particularly valuable. DWR should anticipate reimbursing COGs and local government public works agencies for their time spent on this coordination. We suggest comprehensive programmatic mitigation as well as more specific localized mitigation. •Work with county public works or transportation agencies, SACOG, SJCOG and ABAG, and Caltrans to: a. Prepare traffic mitigation plans with detour maps for road closures or where construction-related traffic is likely to congest key roads. Maps should be developed and available for public comment in the draft EIR, similar to those in the San Francisco Municipal Transportation Agency (SFMTA)'s EIR for its Central Subway project through Chinatown4. b. For priority project transportation routes, consider upgrading unreliable transportation features, such as bridges and ferries, affected by project-related traffic prior to project initiation. c. Where water diversion structures are under construction, designate, sign, and improve as necessary an alternate route for recreational traffic that avoids Highway 160 sections by using parallel sections of River Road on the river's west bank. d. As in the LA Metro Westside Subway Extension Project, establish staging areas and truck haul headways to avoid platoons of trucks upon local roads and freeways. Establish a vehicle dispatching system at construction areas and offsite locations to monitor and address truck headway issues as they arise. e. Restricting nighttime truck haul operations/times for each route, as was done for the LA Metro Westside Subway Extension Project. Truck haul operations should be avoided during peak morning and evening hours, during noise restriction hours, special events, and public holidays. f. Consider transit alternatives for construction workers, including park and ride lots in Elk Grove, Stockton, Tracy, Fairfield, or other locations and dedicated bus service to project construction sites. •To communicate about detours, highway congestion, barge operations, and other project-related traffic conditions, utilize all appropriate methods of communication including but not limited to roadway signs, 511-type notices and alerts, websites, and hotlines. •Establish a transportation/construction coordination office for the life of the project, as in the LA Metro Westside Subway Extension Project, to oversee mitigation measures' implementation, coordinate deliveries and barge movements, monitor traffic conditions, advise motorists and those making deliveries about detours and congested areas, and monitor and enforce delivery times and routes. The office should coordinate its transportation actions with roadway projects of other agencies. It should also coordinate with police, sheriff, fire, and water safety

		personnel regarding emergency access and response times. •To provide a mechanism for adaptive management of transportation impacts and mitigation measures, the coordination office should analyze traffic conditions throughout the construction period to determine the need for additional traffic controls. It should also work with neighbors to address concerns regarding construction traffic, including a mechanism for the public to report anomalies, changes, un-planned work, etc. •When traffic impacts cause loss of business for local businesses, use the Local Business Interruption Fund proposed under the Land Use section. Such programs have been used for the LA Metro and other major public works projects. •To mitigate the project's transportation or greenhouse gas emissions (GHG), consider helping local transportation agencies to implement local programs or projects in the Delta that reduce congestion and locally-generated vehicle miles traveled.
730	Reclamation District 551	It appears that certain proposed facilities' sites would effectively cut the Pearson District in half, with the north tunnels and associated levees potentially running from around Courtland, across the entire district, to and across Snodgrass Slough. RD 551 would thereafter have to operate and maintain drainage and flood control facilities that are (at least potentially) separated by the Delta Conveyance Project's own system of levees. RD 551 will, at a minimum, require access across all Delta Conveyance Project facilities within its boundaries in order to ensure effective, efficient, and uninterrupted maintenance, operation and repair of the reclamation works of the Pearson District.
730	Reclamation District 551	Construction of the project will have severe transportation impacts on the general public and landowners. Routes need to be planned and provided to ensure no disruption in vehicle travel times for emergency response vehicles and schools. Propose mitigation for an and all traffic impacts, including building public access bridges and roadways, and paying to maintain in perpetuity.
731	Mark Pruner Clarksburg Fire Protection District	The EIR must analyze whether, and how or how-not, traffic patterns and changes caused by the Project will impact the District, the Mission of Clarksburg Fire and Fire District property.
732	Friends of the 1883 Clarksburg Schoolhouse (via Mark Pruner, Law Office of Mark Pruner)	The EIR must analyze whether, and how or how-not, traffic patterns and changes caused by the Project will impact the Old Schoolhouse and Old Schoolhouse Project.
740	Ryan Hernandez Contra Costa County Water Agency	The EIR should analyze Impacts to the permanent increase in Vehicle Miles Traveled and the corresponding mitigation.
740	Ryan Hernandez Contra Costa County Water Agency	The EIR should analyze Impacts to the creation of permanent roadway maintenance obligations and corresponding mitigation.

740	Ryan Hernandez Contra Costa County Water Agency	The relocated Byron Highway and the traffic circle appear to conflict with the SR239 project. The Environmental Impact Report (EIR) should address this apparent conflict. It is important to note the desire to have grade separated intersections with the railroad. Grade separation at all major roadway intersections should also be studied. The information provided in the NOP is not sufficient to determine specific impacts, however information provided in the map book at https://www .dcdca.org/pdf/2020-03-11-MapBook.pdf shows considerable road realignment of Byron Highway and the construction of a traffic circle at the intersection of Byron Highway and Armstrong Road. The County is a partner with the Contra Costa Transportation Authority (CCTA) and Caltrans to develop the State Route 239 (SR239) project, which includes the Vasco Road-Byron Highway Connector. SR239 is a legislatively adopted but unconstructed route in the state highway system between State Route 4 (SR4) in Brentwood to Interstate 580 west of Tracy in San Joaquin County. It is the intent that when the project is complete, it will become the new SR239. The DEIR for the Delta Conveyance must recognize SR239 as an approved project and address potential impacts to SR239.
740	Ryan Hernandez Contra Costa County Water Agency	Caltrans does not allow longitudinal utility encroachments in the state highway right-of-way. Utility encroachments at interchanges could impact whether the State will adopt the Byron connector as a future state route. The EIR should address the need to coordinate the location of the project facilities with the appropriate agencies.
740	Ryan Hernandez Contra Costa County Water Agency	The proposed project is located near the Byron Airport. The project shall comply with any Federal Aviation Administration (FAA) regulations and requirements for construction in proximity to the airport and assure that the project is compatible with current usage and future expansion currently under consideration at the Byron Airport.
740	Ryan Hernandez Contra Costa County Water Agency	DWR should include the County early in the planning and design process to coordinate this project with the County's adjacent capital improvement projects. California Department of Water Resources (DWR) must address any impacts that could potentially increase costs or constrain the County's future capital road improvements.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should address impacts to local roads during the construction phase and how this impact will be mitigated.
740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should identify how the proposed realignment of Byron Highway will be completed while maintaining circulation and viability of local businesses during the construction phase.
740	Ryan Hernandez Contra Costa County Water Agency	Byron Highway ls designated as "J4" by Caltrans as a route of regional significance and heavy commerce. The DEIR should address this fact and impacts to trucking and regional commerce and conveyance of goods and services.
740	Ryan Hernandez Contra Costa County Water Agency	Please provide an exhibit to identify the relationship of the proposed pipeline, pump, intake, forebay layout etc. in relation to county roadways to evaluate the compatibility of the facilities to existing and ultimate roadway needs.

740	Ryan Hernandez Contra Costa County Water Agency	The DEIR should include construction phasing for the Byron Highway Road Improvement that includes traffic impact analyses for each phase of construction. If detours are considered for any phase of construction, the detour routes shall be STAA Truck accessible for the detour routes to be viable.
740	Ryan Hernandez Contra Costa County Water Agency	The southern end of the haul route will utilize a segment of Byron Highway that is under the jurisdiction of Contra Costa County The DEIR should analyze truck volume (50 - 150 trucks per day) impacts for each phase of construction. In addition to truck volume impact, the trucks entering Byron Highway shall be cleaned to ensure that debris from the trucks is not carried onto Byron Highway. Using existing rail lines as an alternative to truck hauling should be considered to lessen the construction traffic impacts to Byron Highway.
740	Ryan Hernandez Contra Costa County Water Agency	There is not enough detail at this time to evaluate impacts to existing traffic during and after construction, at this NOP level. However, these impacts shall be thoroughly addressed in the DEIR. Degradation of the roadway surface and traffic impacts shall be fully mitigated post-construction.
740	Ryan Hernandez Contra Costa County Water Agency	It should be noted, that Camino Diablo has been closed to trucks over 7 tons. This cannot be identified as a haul route.
743	The Environmental Council of Sacramento	Accurate transportation impacts must be provided Prior iterations of the Delta Conveyance utilized a worst-case scenario for traffic impacts. There needs to be a concerted effort to provide the most accurate assessment of traffic flows, which should include the calculations for those flows.
746	Friends of Stone Lakes National Wildlife Refuge	Approach to traffic impact analysis must be reconsidered. The traffic analysis for the Waterfix project postulated the “worst case scenario” for trip generation, the peak level of construction related trips on any one segment. That analysis resulted in significant levels of trips on some segments, as much as ten trips per minute, or one trip every 6 seconds. The study did not distinguish between heavy trucks and other vehicles, though it is presumed that heavy trucks would constitute the majority of vehicles. The analysis did not provide any information regarding the length of time that peak traffic periods would be expected over the many years of tunnel construction. The analysis focused on congestion levels without giving adequate consideration to the impacts associated with a preponderance of semi-trailer trucks on the two-lane rural environment. These inadequacies need to be addressed in a more refined and complete traffic Analysis. It is encouraging that presentation materials at the DCA Stakeholder meetings provide more specific information regarding the daily volume of traffic sequenced over the 15-year construction period. This information needs to be included in the EIR. The assumptions for generation of heavy truck traffic and the duration of peak traffic also need to be included in the analysis of impacts.
746	Friends of Stone Lakes National Wildlife Refuge	We are very concerned that the DCA Stakeholder meeting materials identify Hood Franklin Road as a main haul road for project construction activities. The Friends have provided detailed comments regarding the significant effects on both wildlife and recreation that using Hood Franklin Road for this purpose would cause, given that it bisects the refuge and is the access to Refuge Headquarters and the Blue Heron Trail. These impacts must be evaluated along with a greater range of mitigation measures.

746	Friends of Stone Lakes National Wildlife Refuge	New haul roads must be fully described and evaluated. The DCA is considering the construction of new haul roads to support the construction of the intake structures along the Sacramento River. Several of these roads would be within or adjacent to the legislative boundary of the Stone Lakes NWR. The proposed roads must be accurately mapped. Details regarding the construction of these roads must be provided including road width, proposed surfacing, right-of-way acquisition, timing of construction, and post-construction use of roads and right-of- way. The new haul roads would dramatically shift construction-related traffic away from the River Road to lessen impact on properties and communities along the river and transfer it to the terrestrial species the Stone Lakes NWR is trying to protect. The tradeoffs between these impacts must be fully acknowledged and identified.
747	Jan McCleery Save the California Delta Alliance	I am glad that the new single tunnel project design is now no longer planning on putting construction traffic on the Contra Costa County Scenic Highway 160 and the western portions of Highway 12. However, our concerns remain about Highway 4. My detailed information backs up the Independent Technical Review (ITR) Committee saying that if the project remains with the Central Corridor or Eastern Corridor, Highway 4 would require significant upgrades and bridge replacements. It is now a very busy, congested, important road.
747	Jan McCleery Save the California Delta Alliance	Highway 4 gridlock
747	Jan McCleery Save the California Delta Alliance	Highway 4 is a very heavily used road. It is the only road between Stockton and Contra Costa County and is filled with trucks and cars. During commute hours it is a commuting nightmare. The traffic expert's analysis was that adding construction traffic would bring Highway 4 to "gridlock." In the latest DCA plans, Highway 4 remains a roadway that will be heavily used, more so for the Central Corridor than the Eastern, but both have additional construction traffic. The ITR Committee stated the assumption it would be upgraded. That would include improved road with emergency shoulders, new bridges, and improved, raised intersections where construction traffic would go on and off.
747	Jan McCleery Save the California Delta Alliance	The narrow two-lane levee road between (on Hwy 4) the Old River Bridge and the Middle River Bridge and further east to Bacon Island Road would need major upgrades with either the Central or Eastern Corridor. Only the ITR Committee's recommended I-5 route could avoid significant impacts to Highway 4.
747	Jan McCleery Save the California Delta Alliance	In addition, since it is a levee road, construction traffic would cause much damage. There was a segment on a Bay Area TV station a couple of years ago that highlighted the construction issues from the WaterFix project. It was focused on the highway and traffic issues. It would be great if you found that and watched it. It talked both about the Highway 4 gridlock and the issues with the segment of Highway 4 that is the levee road and how additional construction trucks would be so damaging to it.

747	Jan McCleery Save the California Delta Alliance	Accident risks on Hwy 4 road between the Old River Bridge and the Middle River Bridge. Why is it such a risky stretch of road? 1. Heavy commute traffic: A combination of commuters plus large trucks being used to transport goods and fuel from Stockton to Contra Costa County and produce from Delta farms to market. 2. Narrow road – no emergency shoulder. 3. Levee road - sloughs (water) on one or both sides of the road. Steep grade from the road down the sides causing rollovers. 4. Tule fog in the winter is commonplace. 5. Sharp curves before and after both bridges. 6. The bridges are one-at-a-time for trucks and trailers.
747	Jan McCleery Save the California Delta Alliance	That being said, if that Byron Tract maintenance shaft does remain, Phil Ryan said that no new intersections would be built for the two new haul roads. That isn't feasible. Phil had discussed trucks coming from the south, turning right on Highway 4, then turning left onto what is now the farm road. Highway 4 is not wide enough at that point for turn lanes.
747	Jan McCleery Save the California Delta Alliance	Also, the "new" haul road shown on the map is the existing farm road for the Discovery Bay farm there. So, are we talking about a "new haul road" or removing the existing farm road from use, taking Byron Tract out of production?
747	Jan McCleery Save the California Delta Alliance	Obviously, if there is a "new haul road" the north/south haul roads at one spot and an overpass built over Highway 4 to avoid those trucks coming onto Highway 4 at all. Or link the north/south haul roads at one spot and add a traffic light. The approach depends on if trucks are always going just to/from the Byron Tract to the Southern Forebay, in which case the best would be an overpass. That stretch has heavy traffic. Accidents are common at the Old River Bridge and at the Discovery Bay Boulevard intersection, so adding another light could exacerbate the situation. The haul road location and overpass should be constructed to minimize disruption of traffic and of the existing farm activities, if possible. A better solution is not to put a maintenance shaft in Discovery Bay on Byron Tract.
747	Jan McCleery Save the California Delta Alliance	Highway 4 would need to be upgraded for the Victoria Island Maintenance Shaft. Looking at Hwy 4 traveling west to turn into Victoria Island, there are no emergency strips wide enough for a vehicle to pull off. On each side, there is a thin amount of asphalt, then the side of the levee slants down at a steep angle. On the left side, the "greenery" is actually weeds floating on top of the slough – several feet of water. The same is true on the right side. We can't have trucks pulling out often onto Highway 4 there. Trucks slowing down to turn on the farm road are also a hazard. Cars behind them could end up trying to go around them and having a head-on or end up in the sloughs. Preferably, an interchange should be built that bridges over the slough.
747	Jan McCleery Save the California Delta Alliance	The Lower Jones Maintenance Shaft route puts construction traffic on Highway 4. There are at least turn lanes at Whisky Slough Road to access the new haul road. I hope a traffic expert takes a look to see, based on the number of construction trucks and frequency, if stopping to turn there would require an improved intersection or, at a minimum, a longer turn lane.

747	Jan McCleery Save the California Delta Alliance	To have construction trucks in this area requires a major upgrade to the Highway 4 and the two old, narrow bridges at Old River and Middle River, and explains clearly why the ITR Committee said the Central Corridor should be dropped from consideration and even the Eastern Corridor wasn't feasible from an access point of view. DCA/DWR should consider a far eastern route, from an infrastructure perspective.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor Issue Summary: 1. More infrastructure upgrades: Requires more significant upgrades to Highway 4, longer new haul roads, and multiple bridge replacements because construction will be occurring on Delta islands.
747	Jan McCleery Save the California Delta Alliance	1. Eastern Corridor Issue Summary: Less infrastructure upgrades than the Central Corridor but still requires improved roads (including Highway 4), longer haul roads since it is far away from highway infrastructure, and bridges (replacement of Hwy 4 Old and Middle River Bridges and other new bridges because construction will be occurring on Delta islands.)
752	Amber McDowell Double M Farms	Costs associated with construction zones. These must include road and levee maintenance, greenhouse gas levels, and increase time and costs to residents. Road and levee impacts of the detour routes and not just of the construction zones need to be addressed as well. As construction occurs, traffic will use surrounding roads to avoid the construction zone. Before construction on the project starts, upgrades and additional structural support will be required on all surrounding roads that may be used as detour by residents. Then as the construction progresses, those roads will need to be maintained regularly and when the project is complete, a final replacement of those roads will need to be completed. Failure to address this critical issue will subject the residents and islands to levee failure and potential flooding. We have already seen this type of issue occur with the Cosumnes River/ I-5 interchange impact. In addition, the construction equipment that will also be traveling our roads will be hauling excessively heavy loads. The Delta roads are not capable to handle the hundreds of daily overload vehicles trips that this project projects. The roads will quickly deteriorate and threaten the stability of the levees that protect the islands from flooding. Consideration must also be given and addressed for residents who will bear huge additional costs in fuel and wear and tear on their vehicles. While a detour route in the city may only add 1-5 minutes around a single block, in the delta with the rivers and a few bridges, detour routes will cause at minimum, 30 additional driving minutes for most residents.
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: • Obstruction of levee maintenance, flood fighting and emergency response activities through the clogging of Delta levee roadways and channels with construction traffic and equipment, and through the monopolization of barges and repair materials

771	Melinda Terry California Central Valley Flood Control Association	Most of the roads and highways in the Delta are in fact pavement on top of a levee. The thousands of construction trucks on Delta roads 24/7 for 10-14 years of DCP construction will create daily wear and tear on levees that will need to be repaired on an annual basis. The potential for impacts to the levees includes the possibility of deformation and crest depression due to non-uniform settlement and damage to levee slopes due to use of levee hinge points for vehicle turn-outs. The EIR should disclose the number of construction vehicles that will be on the road each day with the number of daily trips each vehicle will make and identify locations where there will be road blockage, re-routing or access issues that will interfere with the ability of RDs to inspect, operate, maintain, repair and flood fight levees.
805	Ashwani K. Rana	The gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
809	Martin Freitas	The gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
822	Karen Coffee	Increased traffic on the west (Clarksburg) side of the river will further damage levees as we saw with the west side of the River Road north of the Freeport Bridge after the opening of Cosumnes River Blvd.
822	Karen Coffee	Re Property located at 36560 Riverview Drive, Clarksburg, CA 95612. Whether, and how or how-not, traffic patterns and changes caused by the Project will impact me and my house.
884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - Impacts on Delta communities and businesses from the gridlock that will occur on Highway 4 due to construction traffic.
889	Todd Scruggs	Impacts on Delta communities and businesses from the gridlock that will occur on Highway 4 due to construction traffic.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft.: Impacts negative on Delta communities and businesses from the gridlock that will occur on Highway 4 due to construction traffic. Hwy 4 is a commute nightmare as it is.
907	Linda Hall	Hwy four has a lot of traffic and cannot sustain the impact of heavy trucks added to destroying the fragile roads.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Impacts on Delta communities and businesses from the gridlock that will occur on Highway 4 due to construction traffic.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Horrible impacts on the historic legacy communities in the north where they are planning on building the intakes practically on top of those communities.
955	Donna Bramble	Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.

956	Betty Miller	Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
957	Martin Freitas	Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
959	Sandra Hagerty	Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
960	John Hoffman	Second, the gridlock that will occur on Highway 4 along with the damage due to construction traffic will cause major, ongoing disruptions to the lives of the residents living in the Delta.
973	Laurie Yglesia	- Impacts on Delta communities and businesses from the gridlock that will occur on Highway 4 due to construction traffic.
905, 906	Mark & Linda Lambert	2). Impacts on Delta communities and businesses from the gridlock that will occur on Highway 4 due to construction traffic.

Table D-31. Comments Regarding Public Services

Letter	Commenter Name, Affiliation	Comment Text
50	Michael Tognolini East Bay Municipal Utility District	As with the Mokelumne Aqueducts, if the Project adversely affects the integrity of the EBMUD Delta Tunnel, there could be significant environmental impacts and costs resulting from the potential suspension of water service that could occur.
50	Michael Tognolini East Bay Municipal Utility District	EBMUD expects the Project to avoid tunneling within the -80 ft msl to -130 ft msl elevation range at the site of the Project's intersection with the EBMUD ROW and to also provide an appropriate additional clearance and mitigation measures between the two facilities to avoid impacts during construction and long term operations. The project should be designed to minimize potential impacts to the EBMUD Delta Tunnel, including designing the project at an elevation to avoid direct interference with the EBMUD Delta Tunnel. To protect the EBMUD Delta Tunnel from adverse impacts, Project design work will require geotechnical investigations similar to those described above to avoid impacts to the Mokelumne Aqueducts. Mitigation measures similar to those described above to avoid adverse impacts to the Mokelumne Aqueducts should also be explored in the EIR as potential mitigation for impacts to the EBMUD Delta Tunnel (i.e., ground improvement, monitoring, coordination with EBMUD regarding Project design, and installation of a two-pass system with secondary watertight tunnel liner to control groundwater seepage and tunnel exfiltration).
235	Tim Stroshane Restore the Delta	The list of potential effects in the NOP are inadequate. Environmental justice effects are omitted, when even the California WaterFix and BDCP environmental documents contained analyses of these effects. Public health effects are confined to risk of mosquito-borne diseases, which are routinely controlled by mosquito abatement districts. Harmful algal blooms (HABs) are not mentioned but need to be. Disturbance of channel sediments that may contain mercury and selenium must be addressed for their water quality, public health, and environmental justice effects. Transportation, noise, and air quality effects must also address not just construction effects but operational effects. By what pathways will continued operation of tunnels generate impacts on surrounding communities and businesses (including farms) from tunnel operations?
244	Gerald Robbins Western Area Power Administration	If there are spoils from the project, these may not impinge upon WAPA's right-of-way easements or obstruct access to towers. Typically, the WAPA easement agreement restricts the landowner from piling or placing materials within the easement area. This restriction is needed to ensure ground to conductor clearance of not less than 35 feet for 69-kV circuits. In addition, 30 feet of unobstructed maintenance access is required around towers.
244	Gerald Robbins Western Area Power Administration	In general, plans for all tunnel crossings, spoil areas, and any other use of WAPA's rights-of-way or easements shall be reviewed and approved by WAPA during the design phase and prior to construction.

244	Gerald Robbins Western Area Power Administration	WAPA requires an entity working in or around WAPA electrical power lines to abide and comply with the National Electric Safety Code and Occupational Safety and Health Administration (OSHA) standards. Equipment within a WAPA easement area shall not exceed fourteen (14) feet in height when the transmission line is energized.
244	Gerald Robbins Western Area Power Administration	During construction activities, DCP must prevent or minimize the proliferation of dust from contaminating and building up on insulators of nearby WAPA transmission lines.
244	Gerald Robbins Western Area Power Administration	In areas where the DCP enters WAPA rights-of-way, all DCP efforts must abide by WAPA's General Guidelines for the Use of Electric Transmission Line Rights-of-Way that can be found on our website at: https://www.wapa.gov/regions/SN/Operations/Pages/right-of-way.aspx
249	Bryan Griess Transmission Agency of Northern California (TANC)	TANC is concerned that certain construction, operation and maintenance activities associated with the DCP could result in significant impacts to public services and utilities, public heath and safety, and soils and drainage near the COTP.
249	Bryan Griess Transmission Agency of Northern California (TANC)	The COTP ROW and transmission towers run in close proximity to the southern extent of the existing Clifton Court Forebay. If such alternatives are considered in the DCP EIR, the following significant impacts to Public Services and Utilities would need to be considered: Forebay expansion across the COTP ROW(s) would significantly and adversely affect those facilities and ROWs. Tower footings were not designed to withstand constant flooding and the reductions in stability that would result from perpetual inundation. Specifically, the following adverse significant physical impacts would likely occur as a result of ROW excavation and flooding: Excavation within 100 feet of transmission tower footings during construction would threaten the integrity of tower footings and risk the collapse of towers. Forebay flooding would severely reduce the integrity of the transmission tower footings, likely to result in tower failure. The structural stability of five or possibly more 500-kV COTP transmission towers would be threatened by excavation and subsequent flooding of the Southern Forebay. The cumulative impacts of excavation and flooding would almost certainly result in one or more transmission tower failures over time.
363	Susan Caston	I'm concerned about my well.
429	Mark Pruner Clarksburg Fire Protection District	The Clarksburg Fire Protection District mission has three parts. We engage in fire suppression. We also respond to mutual aid requests and calls from neighboring districts, including the State of California on occasion, and we provide emergency medical response where needed. The project as proposed would dramatically increase the traffic and congestion in the Clarksburg Fire Protection District on this side of the river. It is imperative that as part of the environmental review process you analyze the accidents, the type of accidents, when, how, and where they might occur to assist us so we can read that document and understanding how to carry out our mission. To increase their burden even more with folks coming in and out of the district, with truck drivers, with other -- with workers, without a plan and without an analysis to the impact on neighbors and the district would be a significant hole in your report, and those impacts must be considered together with mitigation factors.

429	Mark Pruner Clarksburg Fire Protection District	There is concern that you will dewater the wells and water aquifers within the entire project area and beyond, up to a quarter, perhaps a half or even three quarters of a mile from the edge of the project zone, well into this place where we sit today. There must be analysis on how the dewatering of those wells and the taking out of water would diminish, restrict, or maybe quash entirely our ability to meet the first part of our mission, which is fire suppression. Lastly, you were going to draw on natural resources -- excuse me, utility resources such as electric and gas consumption. We use those as well. And your use of those utilities must be analyzed in connection with our mission and how we provide what we do. And we expect to see all of those comments and list those analytical components as part of your report.
495	Rob Ferrera SMUD	As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers. It is our desire that the Project Environmental Impact Report (EIR) will acknowledge any Project impacts related to the following: Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment: (links provided in letter) • Utility line routing • Energy Efficiency • Climate Change
495	Rob Ferrera SMUD	It is SMUDs desire that the Project Environmental Impact Report (EIR) will acknowledge any Project impacts related to the following: • Cumulative impacts related to the need for increased electrical delivery • The potential need to relocate and or remove any SMUD infrastructure that may be affected in or around the Project area
495	Rob Ferrera SMUD	More specifically, SMUD would like to have information on the load requirements for the project incorporated in to the Draft EIR. Based on SMUD's discussions and previous experience with the cancelled CA Water Fix Project (see Water Fix EIR addendum submitted 1/23/2018) the Delta Conveyance Project will have a significant impact on SMUD's system requiring substantial new facilities to support it.
515	Lisa Combs	Public health? Our tunnels will cause increase in contamination. Discharge will happen in our wells and millions -- we all have wells.
549	Maggi Baum	Where will the tunnel start and how does this affect electricity?
736	Kelley Taber County of Sacramento	The County's significant local concerns include: Significant impacts to existing infrastructure; for example, the Freeport Regional Water Project (FRWP), Sacramento Regional Wastewater Treatment Plant (SRWTP), roadways and bridges, historic buildings, rail lines, natural gas wells, groundwater wells, and water lines.
747	Jan McCleery Save the California Delta Alliance	Emergency services issues
747	Jan McCleery Save the California Delta Alliance	The ITR Committee correctly noted that the Central Corridor was not suitable because: "addressing safety, including hospital access and tunnel safety duplication, creates a costly layer or redundancy without definitive costs."

747	Jan McCleery Save the California Delta Alliance	What the lack of fire stations in the area currently means is that for residents that live on the Discovery Bay east side waterways and golf course, emergency help (e.g. paramedics) cannot get to our homes within the eight minutes required to prevent a coma in the case of a heart attack or similar.
747	Jan McCleery Save the California Delta Alliance	The lack of sufficient emergency services in East Contra Costa County is a failure of Prop 13 and the Delta being classified as a "rural" area.
747	Jan McCleery Save the California Delta Alliance	The existing three to four stations have to cover 249 square miles and 128,000 residents. In addition, they cover accidents on Highway 4, the Byron Highway, and Vasco Road. And would be responsible for responding to any construction emergencies at the Southern Forebay and the shafts south of the channel, especially if the Central Corridor is selected. The Eastern Corridor may have some support from Stockton. It would be an extreme risk to locate this huge construction project within the jurisdiction of ECCFPD without paying to reopen Discovery Bay's fire station on DB Blvd, Byron's, and perhaps adding a new one on Highway 4. You should talk to the ECCFPD Fire Chief about what would be needed to support an accident, rescue, or other emergency aid at any of the South Delta construction sites.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor Issue Summary: Safety: The central corridor does not have adequate infrastructure (Fire Stations) to respond to any emergency issues during construction
747	Jan McCleery Save the California Delta Alliance	Eastern Corridor Issue Summary: Safety: The southern part of the corridor does not have adequate infrastructure (Fire Stations) to respond to any emergency issues during construction, but further north may have more access via I-5.

752	Amber McDowell Double M Farms	Personal and Private Property damages. The Delta is a unique area with the rivers, sloughs, and bridges that will require unique planning and additional resources if this project is to move forward. Currently, from my house on Grand Island, it is a 45 minute drive to the nearest hospital. For emergency service, it takes about 30 minutes for them to get out to us since it has to come from Elk Grove before then heading the 45 minutes to the hospital. Our volunteer firefighter medics sometimes can arrive sooner depending on where they are located at the moment, the distance for them to get to the station and then finally out to us. The same for our property. Our firefighters are volunteers with their own jobs. Delays for them to get to the station and then out to the emergency site will be impacted directly from the construction site and indirectly from concentrated traffic on the surrounding detour routes. When minutes matter, extended time due to construction delays, longer detour routes or limited choices for routes/bridges, can impact the wellbeing of individuals and survival of property. Already, the agricultural industry has had several hard years with crop failures, low commodity prices, and increasing regulatory costs, that mental health had become a great concern and issue. Many farmers have developed depression, attempted suicide, or other health issues due to these stresses. This project will only add to that pressure for our Delta farmers. I request that mitigation of this issue be addressed by establishing in the Delta at two or three Delta fire stations at least 4 full time EMT staff on a rotation schedule and EMT service equipment including ambulance and that all Delta fire stations to be staffed full time with a few firefighters to better respond to emergencies during this decade of construction.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Lack of emergency services (ECCFPD only has 4 fire stations, and as we know that isn't sufficient already. And ECCFPD already has to cover traffic and emergency on Highway 4 and the Byron Highway).
927	Jan McCleery	As far as safety, the map DCA posted with the March 11 SEC meeting information, showing Contra Costa County emergency info reflected 9 fire stations within the ECCFPD. We haven't had nine stations since 2008! The best we have are 3-4 (one is closed again now I believe). The nearest Fire Station to construction on Discovery Bay Blvd. has been closed since 2008. Emergency. What the lack of fire stations in the area currently means is that for residents that live on the Discovery Bay east side waterways and golf course, emergency help (e.g. paramedics) cannot get to our homes within the eight minutes required to prevent a coma in the case of a heart attack or similar. I lost our neighbor two houses away from my house due to exactly that scenario. In case of a house fire, the fire department often can only save nearby structures. The house on fire is left to burn. The lack of sufficient emergency services in East Contra Costa County is a failure of Prop 13 and the Delta being classified as a “rural” area. The existing three to four stations have to cover 249 square miles and 128,000 residents. In addition, they cover accidents on Highway 4, the Byron Highway, and Vasco Road. And would be responsible for responding to any construction emergencies at the Southern Forebay. In addition, building tunnel shafts on interior Delta islands threatened with levee failure in the future is very foolhardy. Not to mention the destruction of wetlands and leaving muck piles on islands so that the mercury and other chemicals can drain into Delta waterways is a terrible idea.

973	Laurie Yglesia	- Lack of emergency services (ECCFPD only has 4 fire stations, and as we know that isn't sufficient already. And ECCFPD already has to cover traffic and emergency on Highway 4 and the Byron Highway).
905, 906	Mark & Linda Lambert	7). Lack of emergency services (ECCFPD only has 4 fire stations, and as we know that isn't sufficient already. And ECCFPD already has to cover traffic and emergency on Highway 4 and the Byron Highway).

Table D-32. Comments Regarding Energy

Letter	Commenter Name, Affiliation	Comment Text
244	Gerald Robbins Western Area Power Administration	In the description of proposed project facilities, a "Southern Forebay would be located near the existing Clifton Court Forebay" and would also include a pumping plant and conveyance facilities. Although the precise location of these facilities are not clear at this time, an expansion of the Clifton Court Forebay to the south (which appears to be within the proposed project facility corridor options) will directly impact WAPA's existing Hurley-Tracy No. 1 and 2 double circuit 230-kV transmission line (HUR-TRY 1&2),Tracy-Contra Costa/Tracy-Los Vaqueros 69-kV transmission lines (TRY-CC/LV Lines)and the Transmission Agency of Northern California's (TANC) Olinda-Tracy 500-kVtransmission line (TANC Line) as part of the California-Oregon Transmission Project. WAPA operates, maintains, and holds the land easement rights for this potentially impacted segment of the TANC Line. When developing new transmission corridors, WAPA selects alignments that avoid crossing over or through open bodies of water unless required in order to span over rivers and/or canals. Reasonable access to maintain these transmission lines is critical to the operational reliability of WAPA's electric network and the TANC Line. An alignment of a WAPA transmission line over or through an expansion to Clifton Court Forebay causes significant concerns for WAPA. If a southern expansion of the Clifton Court Forebay is necessary as part of the DCP, then the HUR-TRY 1 & 2, TRY-CC/LV Lines, and TANC Line will need to be relocated/rerouted as required by WAPA and TANC. These lines are part of the bulk electric system and critical to the reliability of the network, therefore acquiring the necessary outages to relocate these lines may be limited or restricted under certain system operating conditions. Due to the close proximity of these lines and the critical role they serve in the reliability of the northern California bulk electric system, the planning associated with the relocation, design configuration, construction, and outage scheduling for these lines must be closely coordinated between WAPA and TANC. It is WAPA's preference to work directly with TANC to acquire the resources and perform these evaluations.
743	The Environmental Council of Sacramento	The full impacts of transmission lines need to be included. The locations of all new transmission lines need to be clearly described and identified as permanent or temporary. A complete analysis of impacts then needs to be provided based on those descriptions and identifications.
743	The Environmental Council of Sacramento	Transmission line strikes need to be analyzed for foraging Sandhill Cranes Prior versions of the Delta Conveyance addressed power line impacts for roosting Sandhill Cranes but did not adequately consider the potential for foraging cranes that are flushed by construction related activities to also hit transmission lines. Analysis of foraging cranes that are flushed and then flying into transmission lines, both new and old lines, needs to be provided.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Another example is analysis of how operating the tunnel would likely increase the state's energy footprint, in direct contradiction of state policy directing otherwise.
746	Friends of Stone Lakes National Wildlife Refuge	Transmission line impacts must be included. The prior EIR/EIS for the WaterFix project did not include a full analysis of the impacts associated with providing electrical power to the project, both during construction and tunnel operation. This was left to a supplemental analysis. The EIR for this project needs to include a full description of both the temporary and permanent transmission facilities for the project and evaluate their impacts.

Table D-33. Comments Regarding Air Quality and GHG

Letter	Commenter Name, Affiliation	Comment Text
21	Karen Huss Sac Metro Air District	Sac Metro Air District provides air quality, greenhouse gas, and toxic emissions analysis expectations, significance thresholds, and mitigation strategies in its Guide to Air Quality Assessment in Sacramento County (Guide). Using the Guide will ensure a thorough air quality analysis is conducted for portions of the project to be constructed and operated in Sacramento County. For full disclosure and ease of review, all emissions calculations and analysis assumptions should be contained in the draft environmental impact report.
21	Karen Huss Sac Metro Air District	Since the Delta Conveyance Project is expected to be a joint state and federal project, please include a General Conformity applicability analysis and determination. If offsite mitigation or offsets will be needed for nitrogen oxide emissions (NOx), Sac Metro Air District recommends early consultation with Department of Water Resources staff since opportunities to reduce large amounts of NOx in the Sac Metro Air District may be limited and expensive.
21	Karen Huss Sac Metro Air District	In January, the Sac Metro Air District released its draft Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District covering the analysis and disclosure of potential health effects resulting from new project emissions. Consult the new guidance when analyzing the Delta Conveyance Project's emissions
21	Karen Huss Sac Metro Air District	A specific health impact not addressed in the Friant Ranch guidance is Valley Fever. To reduce potential exposure and resulting health effects, include preventative fugitive dust control measures for construction activities and provide a public education campaign for nearby receptors.
21	Karen Huss Sac Metro Air District	All projects are subject to Sac Metro Air District rules in effect at the time of construction. A complete listing of rules is available at www.airquality.org. Specific rules that may be applicable to construction activities is also available in the Sac Metro Air District's Rules & Regulations Statement.

21	Karen Huss Sac Metro Air District	Footnotes: i Guide to Air Quality Assessment in Sacramento County, accessed January 27, 2020, http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools ii General Conformity website, accessed January 27, 2020, https://www.epa.gov/general-conformity iii AB 2800, accessed February 12, 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB2800 and Paying it Forward: The Path Toward Climate-Safe Infrastructure in California, September 2018, https://resources.ca.gov/CNRALegacyFiles/docs/climate/ab2800/AB2800_ES_FINAL.pdf iv AB 1482, accessed February 12, 2020, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB1482 vExecutive Order B-30-15 related guidance, accessed February 12, 2020, http://opr.ca.gov/planning/icarp/resilient-ca.html viDraft Friant Ranch Guidance, released January 31, 2020, www.airquality.org/LandUseTransportation/Documents/SMAQMD_FriantRanch_DraftFinalPublic.pdf vii California Department of Public Health Valley Fever Fact Sheet, August 2019, https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/ValleyFeverFact heet.pdf viii Rules & Regulations Statement, June 2018, http://www.airquality.org/LandUseTransportation/Documents/Rules%20attachment_6-18Final.pdf
53	Leland Frayseth	Please dial in the green house gas emissions from moving tunnel muck around in trucks and barges after you bring it to the surface. If you try to fine tune your electrical load emissions offsets with wind or solar you need to show you will be pumping when wind or solar are available which will be difficult because solar is not predictable when it is rainy or when you need to time your north intake diversions to avoid high tide saltwater intrusion.

153	Charles Wilson Southern California Water Coalition	As the environmental review process advances, it is critical that any examination of the probable effects of the project's construction on air quality and greenhouse gas be considered within the context of the massive concentrations of carbon dioxide historically, and currently, being emitted by long-standing farming practices on peat soils in the Delta.. The U.S. Geological Survey, California Department of Water Resources, HydroFocus and the University of California at Berkeley have been studying subsidence and GHG emissions since the 1980s and have found significant effects. Drained and cultivated organic soils continue to oxidize, subside and emit an estimated one to two million tons of CO2 released into the atmosphere each year. Eliminating those emissions would be the equivalent of removing 300,000 vehicles from California's roads. Some say that current farming practices on much of these lands are unsustainable, with the interior of Delta islands sitting as much as 30 feet below sea level and sinking every day. These practices also increase risk of the devastation that sea level rise or an earthquake could have on these friable levees built more than a century ago. We urge a holistic view of air quality and greenhouse gas emissions that not only looks at construction's effects but also at the larger landscape of current and harmful land use practices. Preservation and protection of the Delta "as a place" must account for the realities of carbon emissions caused by historical and current farming practices. Fortunately, Delta island farmers have begun the inevitable conversion of this land into wetlands, swapping harmful agricultural practices for the restoration of habitat supporting wildlife. Farmers may soon be able to sell carbon capture and reduction credits at scale to help reduce the state's emissions. The Delta Conservancy through the Delta Carbon Program aims to complete the first-ever third-party verification of wetlands that quantifies the carbon emission reduction estimates from 1,600 acres of managed wetlands on Sherman and Twitchell islands operated by the California Department of Water Resources and hope that these findings will inform a full view of air quality and greenhouse gas emissions related to construction of the Delta Conveyance project.
274	Mariah Looney Restore the Delta	I also want to make sure that the air pollution impacts from construction on rural communities and urban Southwest Stockton communities near the port are taken into consideration. Southwest Stockton is a newly designated AB-617 area with many known air pollution problems. This project will not only increase air pollution impacts to an already environmentally and economically stressed community, but it will -- we just want to make sure that there is more mitigation that happens.
310	Charles Wilson Southern California Water Coalition	And since it was mentioned by the previous speaker, I do want to encourage you as we're looking at carbon emissions -- I believe it 's part of the CEQA documentation. The evaluation of the current carbon emissions from the deteriorating existing Delta is the single-largest carbon emittance in California . I think that's part of the evaluation so when you're comparing apples to apples, you actually get the apples - to-apples comparison.
315	Arnaud Marjollet San Joaquin Valley Air Pollution Control District	Comments consist of 9 pages of air quality analyses and related recommendations for the project.

323	Jeff Balmores	The Delta Tunnel Project detrimentally affects our air quality due to variables such as construction sites, causing more bacteria and the HABs bacteria in our waterways. The construction increases the emission of carbon dioxide and other pollutants. The bacterium is airborne and detrimental to our bodies.
325	Bill Wells California Delta Chamber and Visitor's Bureau	So if I can just add one thing, Wade Crowfoot, the Natural Resource Secretary, can't let his -- have his wear a gas mask because the California air is unfit to breath.
329	Nicholas Hatten LGBT Social Justice Initiative	And what do we have to say about the impact this proposal will have on our quality of air, which is already rated the fourth worse in our nation?
337	Elaine Baret Little Manila Rising	This will increase air pollution impacts on urban and rural communities like my home in Stockton. It's a domino effect on our air quality -- it's a domino effect on our quality of life from policies put into place.
337	Elaine Baret Little Manila Rising	How much more pollution are we expected to live with?
349	David Scatena	I am concerned about air pollution.
353	Phillip Merlo San Joaquin Historical Museum	And the construction and operation of this project to prop up these unsustainable businesses and developments in the Southern part of the state will lead to the release of tens of thousands of acre feet of peat dirt into Delta air.
371	Mariah Looney Restore the Delta	What will the air pollution impacts from construction be on rural communities especially, and urban communities near the port, which has -- southwest Stockton is now an AB 617-designated area by the State.
394	Mariah Looney Restore the Delta	There will be too many -- too much greenhouse gas emissions for water or for water that will be taken away from others.
437	Bill Wells California Delta Chambers and Visitors Bureau	It appears that the electricity plant supporting the current Tracy pumps spew out about 400,000 tons of carbon dioxide per year. Now, when you add that to the 400 estimated diesel truck trips into the Delta every day during the construction period of 10 or 20 years, whatever it's going to take, the people in Hood, number one, they are going to be buried in carbon, and the people in Clarksburg and every community around here with the same thing. So we've got a huge problem with that. It is absolutely unacceptable.
492	Jacklyn Shaw	In concerns of health and soil salinity, Delta Breeze, 20–60-90 miles per hour, can cause increased health problems of allergies, dry throat and more. Stirring up itchy, peat dirt (fertile for fresh food crops) would mean increased health problems, east of Delta River. Any conveyance, 60 feet wide, near Terminous with Tower Park and water recreation, is horrifying to those few who have seen the map plan. That would be 7-12 miles from my folks homestead vineyard and City of Lodi.

539	Michael Brodsky Save the California Delta Alliance	A single-tunnel project also itself contributes significantly to carbon emissions over the very long run and thereby hampers California's ability to rapidly reduce carbon emissions. It does this because it locks in export of Delta water to the Metropolitan Water District ("MWD" or "Met"), the major advocate and financial guarantor of the single-tunnel project, and to other south of Tehachapi contractors. The State Water Project ("SWP") is one of the worst carbon offenders in the nation, if not the world. The SWP consumes approximately 8,000 gigawatt-hours of electricity each year. SWP dams and hydropower plants generate about half that much, leaving 4,000 gigawatt-hours of net energy consumption, much of which is generated by gas-fired power plants.3 (https://water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, last visited April 12, 2020.) DWR has taken some steps in recent years to address the most egregious climate offensive aspects of the SWP, including elimination of a filthy coal fired power plant in Nevada as a source of purchased SWP power and bringing online the Pearblossom Solar Facility. However, the fact remains that the SWP wastes enormous amounts of energy because delivering Delta water to Southern California is by far the most energy intensive source of water while much more energy efficient means of supplying southern California are readily available. The SWP is the largest consumer of electricity in California and the Edmonston Pumping Plant (which pushes Delta water up and over the Tehachapi Mountains to Met's service area) consumes 40% of SWP electricity usage. (https://www.watereducation.org/aquapedia/ad-edmonston-pumping-plant, last visited April 15, 2020.) Edmonston is the largest single-point user of electricity in California. (David Carle, Introduction to Water in California (2d ed. 2016) p. 103.) Additional electricity consumption occurs at the pumping plants prior to Edmonston in the foothills, and at distribution pumping plants south of the Tehachapis. Delta water delivered south of the Tehachapis consumes over 5,000 kWh/acre foot. By comparison, water re-use (including Reverse Osmosis filtration) supplies water at about 1,200 kWh/acre foot and many conservation and water efficiency measures are available that use only nominal amounts of energy. Even the more energy intensive alternatives come in at less than 2,000 kWh/acre per acre foot. (See, e.g., Professor Bob Wilkinson, August 23, 2007, presentation to the State Water Resources Control Board, Water, Energy, and Climate, p.9 [Attachment 1].) It simply does not make sense in the face of a climate crisis to found California's water future on pushing trillions of tons of water up and over a half-mile high mountain range. Current pumping burns massive amounts of fossil fuel. The clean energy we may acquire in the future must be applied to more rapidly replacing carbon-based power in essential sectors of the economy. It would be hard to imagine a waste of energy more profligate than continued export of Delta water to Southern California. It is time to implement a planned retreat from exporting Delta water south of the Tehachapi Mountains, thereby achieving the Delta Reform Act's imperative to "reduce reliance on the Delta in meeting California's future water supply needs" by completely replacing Met's Delta water supply with "improved regional supplies, conservation, and water use efficiency," (Wat. Code § 85021), and carefully reassessing the delivery of Delta water to other south of Tehachapi contractors.

542	Bruce Campbell	Air quality during the construction phase of the DCP must be evaluated in the EIR in terms of amounts of certain kinds of emissions, in terms of how long major construction activities will last in a specified or greater area with such emissions, but also in terms of how the massive dust clouds sometimes more or less combine with toxic emissions and massive dust clouds to impact sensitive receptors and others in the Stockton and other areas of the Delta region. I also consider Lathrop to be an EJ community – partly because I am aware about most of the workers going sterile over 40 years ago when manufacturing DBCP at an Occidental Chemical facility in that town.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent do the DWR and DCA plan to consider the environmental impacts of construction on air quality in the greater Delta? How will the construction process create more CO2 emissions from increased traffic on Delta roads and highways, and how will the massive amount of waste product from the drilling of the tunnel be controlled so as to avoid a sharp increase in PM2.5 concentrations in Delta air? Communities in Southeast Stockton, near where planned project site near Rough & Ready Island, suffer from some of the highest rates of asthma in the state. How do the DWR and DCA plan to mitigate the degraded air quality in Stockton that will inevitably result from the project? Does the DWR have a plan for measuring and avoiding degraded respiratory health outcomes as a result of this project?
629	Mary Elizabeth Sierra Club of California – Delta Sierra Group	The DEIR should include a robust cumulative air quality analysis that evaluates community-based impacts associated with the construction and operation of the proposed tunnel, particularly relating the disadvantaged communities.
684	Jeff McCormack John McCormack Co.	Dust and fumes from construction and electricity generating plants should be projected, including impacts and health effects adjacent residences.
692	Mark Goble	Traffic, already congested in the area, will be slowed by the construction equipment and bridge openings for waste removing barges, causing significant adverse effects on air quality from emissions.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR must address how the Project will increase the state's greenhouse gas emissions. DWR's SWP is already the largest single power consumer in California, and while DWR generates a significant portion of that power through hydroelectric and solar projects, it still relies upon greenhouse gas-emitting power sources to provide power to pump SWP water through the state. It appears that DWR's greenhouse gas emissions increase with the quantity of SWP deliveries, and thus are likely to increase if the Project does "restore" SWP deliveries
702	Frank Toriello We Advocate Through Environmental Review	This project will require significant expenditure of energy to pump the water. The EIR must identify energy sources that will result in zero GHG emissions.
704	Eric Jenks Wilbur-Ellis Company	If a launch site or other Project component near the Twin Cities facility is included in the proposed Project, the EIR should (a) should fully analyze the environmental and related impacts of such Project component, including impacts to greenhouse gas emissions and air quality.

704	Eric Jenks Wilbur-Ellis Company	The impacts on traffic associated with any disruption or closure of the Twin Cities facility would, naturally, cause impacts to air quality and greenhouse gas emissions associated with more vehicle miles traveled. If the Twin Cities facility was disrupted or closed, W-E's customers would have to travel much farther to access agricultural products and services. The next closest W-E facility would be north and/or west of Sacramento (Woodland, Dixon and Rio Linda), or far to the south (Manteca). These impacts to air quality and greenhouse gas emissions must also be considered.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	In addition, the overall river water table will also be lowered and will require more Delta water users to have to pump more. Currently, the river water table on many of the islands is between 3-6 feet which naturally sub irrigates some of the crops. This has allowed the area to have lower greenhouse gas emissions from having less pumps and shorter pumping times. But as the river water table is dropped and out of reach for the crops, Delta farmers will have to start pumping more water out of the river to water their crops, which will cause them to have to use more fuel and increase greenhouse emissions. We request that the EIR include the additional greenhouse gas emissions from additional required pumps and pumping time that will be needed to water crops due to the river water table drop that will result from this project.
718	David Strecker San Joaquin Farm Bureau Federation	In addition, the overall river water table will also be lowered and will require more Delta water users to have to pump more. Currently, the river water table on many of the islands is between 3-6 feet which naturally sub irrigates some of the crops. This has allowed the area to have lower greenhouse gas emissions from having less pumps and shorter pumping times. But as the river water table is dropped and out of reach for the crops, Delta farmers will have to start pumping more water out of the river to water their crops, which will cause them to have to use more fuel and increase greenhouse emissions. We request that the EIR include the additional greenhouse gas emissions from additional required pumps and pumping time that will be needed to water crops due to the river water table drop that will result from this project.
721	Michael McDowell Double M Farms	The project has noted that the number of construction vehicle trips will be potentially 300 per day and have identified that as an issue for greenhouse gas emissions. But I request that the EIR also include calculations and mitigation for all of the additional emissions created by residents having to travel around the construction sites on detour routes.
721	Michael McDowell Double M Farms	I request that the EIR include the mitigation costs for the pump extensions for all of the Delta water users' thousands of pumps.
752	Amber McDowell Double M Farms	The project has noted that the number of construction vehicle trips will be potentially 300 per day and have identified that as an issue for greenhouse gas emissions. But I request that the EIR also include calculations and mitigation for all of the additional emissions created by residents having to travel around the construction sites on detour routes.

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	NOP Page 9, Potential Environmental Effects - "Air Quality and Greenhouse Gas ... " Air quality impact assessments require construction location, timing, duration, equipment used, etc. Greenhouse gas impacts require analysis of changes in reservoir operations and SWP systemwide water quality as they affect and contribute to CO2 greenhouse gas emissions. This later impact contribution requires detailed project water operations information which the NOP has declared the project will not provide until after the completion of the EIR process.
767	Kelley Taber City of Stockton	Construction of the tunnels and other facilities, including truck and rail trips, could have significant adverse impacts from criteria pollutant and toxic emissions, including impacts to environmental justice communities.
865	Phyllis Bala	— The negative impact that construction of the Delta Tunnel would have on Delta communities (increased truck traffic and pollution, decreased air quality)

Table D-34. Comments Regarding Noise

Letter	Commenter Name, Affiliation	Comment Text
560	Bradford Pappalardo Steamboat Resort	Noise will directly impact our business. The resort is a place where our guests come to get away from the noise and congestion of urban areas. They are likely to stop coming noise impacts from construction of the intakes and vehicle traffic, especially if it ensues every day for 10 or more years. Our business will be shut down. This is a special place to many who have come here since they were children, and it will be unlivable. There is likely no mitigation for this but some sort of mitigation must be worked into the project as this will be a direct impact of construction. Furthermore, there is discussion of using a vibratory hammer to drive piling and keep the noise levels down. From my experience with docks, a vibratory hammer will not drive piling into rip rap which is at the base of the levee system along the Sacramento River. An impact hammer will have to be used and this noise levels will be unbearable to all visitors within the Delta, as well as to the fish that should be protected during construction of this project.
574	Philip Merlo San Joaquin Historical Society & Museum	To what extent do the DWR and DCA plan to forecast and mitigate the health impacts of construction noise on communities along the path of the project, including but not limited to the inhabited communities of Courtland, Walnut Grove, Elk Grove, Lodi, Terminus, Stockton, Lathrop, Discovery Bay, and Mountain House? Does the DWR plan to consider the latest research on industrial noise and cognitive development in children in their project planning?
620	Mark Pruner On Behalf of Residents and Members of the Clarksburg Community	Show how noise disturbance, as well as construction-related impacts to the Residents, each of the Residents, and the Clarksburg Community, or any significant part of the Clarksburg Community, will be minimized.

729	Erik Vink Delta Protection Commission	Reduce project-related noise. The Delta is quiet. Its loudest sounds are often a dog barking at a nearby home or farm machinery in a neighboring vineyard or farm. For this reason, noise can be one of the most disruptive impacts of the proposed project. In addition to its direct effects, it also contributes to changes in land use, disturbs recreation, and has other secondary impacts. Every approach to reducing it should be employed. Thresholds of significance used to assess noise impacts should reflect the Delta's existing conditions and the land use in areas where noise effects would occur. One threshold would be noise that exceeds the background sound level by at least ten (10) dBA during daytime hours (seven a.m. to ten p.m.) and by at least five dBA during nighttime hours (ten p.m. to seven a.m.).Noise standards of applicable local government general plans and ordinances should provide another set of thresholds, as these reflect local land use, residents' expectations and other local conditions. Where local standards are unavailable, or where there are special uses, such as parks, nature areas, recreation sites, schools, libraries, churches, or other especially sensitive uses, these federal guidelines should be considered. Ldn < 55 dB: Outdoor activity interference and annoyance Ldn < 45 dB:Outdoor areas where people spend limited amounts of time, such as schoolyards, playgrounds, etc. Indoor activity interference and annoyance Leq(24) < 45 dB: Indoor residential areas. Other indoor areas with human activities such as schools, etc. Leq(24) < 70 dB: Hearing loss All areas. Source: U.S. EPA, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Section 4, Identified Levels of Environmental Noise In Defined Areas. March 1974. Leq(24) = the sound energy averaged over a 24-hour period. Ldn = the Leq with a 10 dB nighttime penalty Because these thresholds are, in part, derived from current noise levels, it is important that the EIR be based on recent monitoring of noise conditions in affected areas, rather than textbook estimates as were used in the BDCP/WaterFix EIR. The schedule for the EIR's preparation should provide time for this monitoring, as would be provided for monitoring wildlife and fish if recent data were unavailable. To do otherwise would not reflect the best available science. Noise impacts should be calculated for all construction activities, including construction-related traffic, and for project operations. These calculations should be based on the equipment proposed to be used in project construction, such as types of piles and pile drivers. To help public understanding of noise impacts, areas where cumulative project-related noise would exceed any of these thresholds, as applicable, should be identified as adversely affected. Individual structures adversely affected by this noise, as well as lands affected, characterized by land use, should be identified and mapped, so that the number of homes and businesses, and the acres of land harmed can be reported. When especially sensitive uses, such as nature areas, recreation sites, schools, day care facilities, libraries, or churches would be adversely affected, they should be named. Information about construction staging should be used to indicate the duration of these noise effects

729	Erik Vink Delta Protection Commission	Do not defer noise mitigation. Plans to mitigate noise impacts should be proposed now, not deferred until after the project is approved, as was proposed in the BDCP/WaterFix EIR. To avoid noise that exceeds significance thresholds, these plans should deploy a full menu of measures, such as those cataloged by the Federal Highway Administration (https://www.fhwa.dot.gov/ENVIRONMENT/noise/construction_noise/handbook/handbook07.cfm). They should describe equipment that will be used to reduce noise and vibration, such as pressed in pile installations, vibratory pile drivers, or University of Washington quiet piles. Residences, businesses, and schools that will be exposed to excessive noise should be eligible for funding from DWR/DCA to install sound insulation by replacing doors and windows, as well as adding insulation and ventilation systems where necessary, so that the interior noise level is reduced to 45 dB and achieves at least a 5 dB reduction from previous noise thresholds, as Los Angeles residents are offered under the LAX Master Plan. Where noise cannot be reduced to acceptable levels, a voluntary acquisition program, plus relocation assistance should be offered to both owners and tenants in compliance with the Uniform Relocation Act. At a minimum, these measures must comply with the Delta Plan's MMRP measures 15-1 through 15-3. Local agencies, community members, and affected residents and businesses should be involved in developing these measures. Because construction-related traffic strongly influences noise impacts, these measures should be coordinated with plans to manage construction-related traffic.
747	Jan McCleery Save the California Delta Alliance	New noise and pollution impacts due to new Byron Tract Maintenance Shaft
747	Jan McCleery Save the California Delta Alliance	Right when we think DCA has listened to concerns expressed about noise and trying to minimize the impact on citizens, we see a decision to plop a maintenance shaft in Discovery Bay, less than a half mile from the Discovery Bay waterfront homes! From a personal standpoint, I will see and hear that shaft from my back deck and will hear the pounding all night for years. STCDA's noise expert witness at the SWRCB Permit Hearings testified how noise pollution is more noticeable in rural areas and more amplified around water. This construction will severely impact the citizens of Discovery Bay and impact their home values.
747	Jan McCleery Save the California Delta Alliance	I can't tell what the construction traffic would be north of the Southern Forebay. A concern Is that north of the Southern Forebay on the Byron Highway is Excelsior Middle School, the only middle school for both Discovery Bay and Byron. An analysis of the impact of the added pollution and noise on that school needs to be considered and mitigated.
747	Jan McCleery Save the California Delta Alliance	For boating and recreation, construction issues still remain due to the noise and pollution from shaft sites impacting places to anchor in the Delta. The Bedrooms Anchorage is one that is affected by noise and construction lights for boats anchoring out to enjoy the peace and quiet. The other significant anchorage is Mildred Island.

747	Jan McCleery Save the California Delta Alliance	The noise impacts from expert testimony about the effect of building the intakes so close to the legacy towns in the North and the total ruin of the town of Hood. Similar impacts occur across the waterways at Clarksburg and Courtland.
752	Amber McDowell Double M Farms	Noise pollution and vibrations. The amount of noise pollution that will be continually present throughout the entire construction from pile diving will not just be a nuisance, but a health issue for people and a damaging ecological issue. Animals tend to avoid noisy areas and the Delta is a critical wintering ground essential for Sandhill Cranes and a host of other migratory birds. The vibrations from the pile driving will also cause damage to some residents' houses. This will directly affect property values and the ability to sell. This is not only a detrimental impact for residents who may need or want to sell, but also for mortgage appraisals and collateral value for banking. Many farmers use their property as collateral for their business in-line credit loans since they have to pay for inputs and services at throughout the growing season, but don't receive payment for their crop until after the growing season. I request the EIR analyze the impact of vibrations on centennial homes including multiple story, plaster walls, and those built on sandy soil and what mitigations the project must follow to protect these historic buildings. I request the EIR also analyze the distances on the degree of impact due the vibrations.
822	Karen Coffee	Increased noise, disruption in well water operations and availability, septic and wastewater operations and availability, and access to vital services can also be anticipated.
901	Michael Davis	Also with the shaft construction noise and impact to our community, Along with Highway 4 is already a dangerous road without all of this.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft.: Constant construction and drilling noise
929	John Carolla	As a resident of Discovery Bay, CA, I am voicing my frustration to the impact that these tunnels will have on our community. I feel like the state is forcing this water diversion down our throats with no consideration to the impact that it will have on the lives of our community. The congestion and noise from this project will ruin the waterways that we now enjoy. All of this is being pushed, so Southern California can water their lawns. Please stop this.

Table D-35. Comments Regarding Hazards

Letter	Commenter Name, Affiliation	Comment Text
11	David Gloski	I think there should be a category of Public Safety considerations and include both concerns during construction and during operation. Operation concerns should include the effects of the intakes on the flow of the river and the issue of safety regarding swimmers or people falling overboard near the intakes.
17	Leland Frayseth	The high cost and risk of constructing the Scary Tunnel through Delta gas wells and pipelines needs to be thoroughly and publicly vetted through the EIR process. Letter includes photos from the 2015 Conceptual Engineering Report depicting knows gas pipelines and wells in the Delta.
138	Jan Vick Former Mayor, City of Rio Vista Former Commissioner, Delta Protection Commission	Since I have no doubt that DWR will undertake an EIR for this particular project, the following issues MUST be thoroughly discussed. The Delta lies on one of the largest natural gas reservoirs in the west. There are numerous gas wells throughout the Delta along with pipelines and pumping. You must show how the tunnel will interfere with these gas operations and the overall reservoir. You will need to show exactly where these gas wells occur and the pipelines that run through the islands.
201	Kristen Oliner Restore the Delta	The harmful algae blooms are showing indications of airborne toxins which impacted environmental justice communities.
248	Tom Williams	Provide definition of “ancillary facilities”, e.g., chemical additives and mixing.
249	Bryan Griess Transmission Agency of Northern California (TANC)	The project is likely to propose the construction, operation, and maintenance of temporary and permanent transmission lines needed for DCP power that could cross the COTP ROW at several locations. Accidental or inadvertent contract with energized 500-kV transmission lines and towers could result in significant public health and safety impacts including serious injury, electrocution and in some instances, facilities.
417	Barbara Daly	The gas wells in the Delta are numerous in the path of the tunnel. Dodging them will be impossible. And finally, the noise and air pollution, construction impacts, bridge and road transportation issues are immense. The problems in warning in the last EIR that we will abandon our homes and buildings is already creating inverse condemnation here for us who live in the Delta.
420	Jeff Durbin	One person sent in pre-meeting information to the Water Board entitled, "Constructing the Scary Tunnel Through Delta Gas Wells 5 and Pipe Lines." They mentioned -- referenced an article that was in the LA Times that describes a methane gas explosion accident that killed 17 construction workers during a water tunnel -- construction of a water tunnel by Lockheed for one of the Delta Conveyance partners in Southern California. I would send you a link to the article, but I'm afraid I didn't read it. They had a map included with all the gas, known gas areas, lines, and fields in the area here. There was some rebuttals about the depth wouldn't matter, that some of them are to shallow to worry about the pipes, and the other gas fields would be lower than would matter.

435	Russel van Loben Sels	On page 5 of your NOP, I refer to Earth and material removed from below ground surface as reusable tunnel material. In fact, it was initially referred to as "tunnel muck," and it should not be referred to as reusable tunnel material until it is analyzed for contaminants. And until it is determined that it's free of contaminants, provisions must be made to stored material or transfer it out of the construction area, and all negative impacts related to the storage and/or transport of the material must be analyzed and mitigated. The same should apply for the water removed to dewater, the tunnel construction and area.
542	Bruce Campbell	Will there be any sort of procedure to evaluate whether certain dredged soil needs to be disposed of at a Class I toxic dumpsite(?), or are you just assuming it won't be too toxic so use it as embankments or store it in the launch shafts? WILL a certain percentage of DREDGED MATERIAL BE EVALUATED FOR IT STOXICITY during at least some of the DCP construction phase?
635	Jim Rich	Pages 9 and 10 of the NOP is a long list of what are called both "potential" and "probable environmental effects" from constructing and operating the DCP. Two significant potential environmental and socio-economic effects are missing from this list:1.The risks to the stability and structural integrity of certain important Delta levees due to boring a large DCP tunnel under those levees.2.The dangers that constructing the DCP in a Delta full of abandoned and active natural gas wells and pockets of natural gas could result in a catastrophic explosion, such as the one that occurred on June 24, 1971, when a methane gas explosion in a water tunnel being drilled for the SWP beneath Sylmar, CA killed 17 workers.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Tunnel Muck. The muck that will be removed during the tunneling needs to be handled like Hazardous Waste Material. It is known that the earthen material deep in the delta contain Valley Fever spores. Also, the liquid muck will not be suitable to just dump on the existing levees as a structural enhancement. This should not be continued to be referred to as 'reusable' until this material is adequately analyzed for additional contaminants. Until it is determined to be free of contaminants, provisions must be made to store the materials or transfer it out of the construction area. All negative impacts related to the storage or transport of the materials must be analyzed and mitigated. The EIR needs to address the costs and processes of removal, disposal, storage, testing and transport of all tunnel muck brought up to the surface.
718	David Strecker San Joaquin Farm Bureau Federation	Tunnel Muck. The muck that will be removed during the tunneling needs to be handled like Hazardous Waste Material. It is known that the earthen material deep in the delta contain Valley Fever spores. Also, the liquid muck will not be suitable to just dump on the existing levees as a structural enhancement. This should not be continued to be referred to as 'reusable' until this material is adequately analyzed for additional contaminants. Until it is determined to be free of contaminants, provisions must be made to store the materials or transfer it out of the construction area. All negative impacts related to the storage or transport of the materials must be analyzed and mitigated. The EIR needs to address the costs and processes of removal, disposal, storage, testing and transport of all tunnel muck brought up to the surface.

743	The Environmental Council of Sacramento	Analysis needs to assume that all Reusable Tunnel Material (RTM) will need to be disposed, rather than repurposed The chemical composition of the surfactants used in the tunnel boring process has not been disclosed, and given the proprietary nature of that information, it is reasonably foreseeable that will remain the case. Analysis must be included for the impacts associated with the disposal of all of the RTM – testing the RTM as it comes out will be too late to adjust the environmental analysis if it is determined that the RTM is not usable, even though the analysis assumes that some or all of it could be repurposed.
746	Friends of Stone Lakes National Wildlife Refuge	Reusable tunnel material surfactant issues must be addressed. The NOP indicates that the project will sample reusable tunnel material (RTM) as it is removed during the boring process to determine if it can be reused, and if not, how it will be disposed. The project proponents have to date refused to disclose the composition of chemical surfactants used with the boring machines. In the absence of any information as to whether or not the surfactants pose a hazard to humans or wildlife, it must be assumed that all RTM is hazardous and will need to be transported to safe disposal areas. The project must include information that satisfactorily demonstrates that the surfactants will not pose a significant adverse impact, or analyze the environmental effects of disposing all RTM outside of the Delta.
747	Jan McCleery Save the California Delta Alliance	when considering the central Delta soils, those have reported to have significant mercury and arsenic. Plus there are RTM treatment chemicals that were stated to not be harmful to humans but are hare on the eyes. Instead of muck ponds in the central islands of the Delta, where run-off can flow into the Delta waters, muck should be hauled off, or at least stored far from the Delta waterways where it can be properly treated.
747	Jan McCleery Save the California Delta Alliance	The Central Corridor Issue Summary: Has more risk: a. Shaft sites are on islands that are severely subsided and digging borrow pits on them to get fill dirt to build up the shaft site would further increase the potential of a levee failure. b. In case of a levee break, the new haul roads would be under water and shaft sites inaccessible. Since the risk of earthquakes and levees being breached is a significant part of the cost/benefits analysis of a tunnel, ignoring that risk seems imprudent. That is why people in the Delta have always been surprised that the tunnel wouldn't follow the I-5 corridor and be far away from the fragile Delta islands. c. Soils are the worst for tunneling through. They are soft, alluvial soil. Tunnel experts witness testimony during the SWRCB and DSC Hearings raised many issues that could occur tunneling under the railroad where it is on a trestle, under EBMUD's water and gas line, exacerbated by soft soils. The new plan shown in the "Byron Tract Maintenance Shaft" illustration shows the tunnel route dangerously close to Discovery Bay homes.
752	Amber McDowell Double M Farms	Gas Fields. Digging a tunnel through the Delta region will be hazardous and has the potential for explosions. Several gas fields have been identified by the state including Hood-Franklin Gas, Snodgrass Slough Gas, Thornton Gas, Thornton W Walnut Grove Gas, River Island Gas, East Island Gas, Rio Vista Gas, McDonald Island Gas, Roberts Island Gas. Also, peat soil can be dangerous if it catches on fire as it can burn underground for a long time. There will be lots of fuel and oil from the construction equipment and tunneling machine that could be ignited. I request the EIR address all hazards and impacts associated with the surrounding gas fields.

752	Amber McDowell Double M Farms	Tunnel Muck. The muck that will be removed during the tunneling needs to be handled like Hazardous Waste Material. It is known that the earthen material deep in the delta contains Valley Fever spores. Also, the liquidly muck will not be suitable to just dump on the existing levees as a structural enhancement. With the Delta having a strong breeze almost daily, all of the muck that is brought up needs to be promptly removed from the Delta region. The EIR needs to address the costs to properly remove and dispose of all tunnel muck brought up to the surface.
752	Amber McDowell Double M Farms	Intermediate Forebay. The size and location of the Intermediate forebay is a concern. The 30 foot high embankments would place this feature well above the levee by potentially 10-20 feet and in sight for miles around the delta. Appurtenant structures and a permanent crane would be an additional 10 feet above the embankments. Again, ruining the natural aesthetic views of the Delta. The placement of this 250 acre intermediate forebay is also concerning. The last proposal had it placed right behind the elementary school in the small town of Courtland. If failure of that forebay should occur, the first to be hit would be the school, wiping out an entire generation for families in Hood, Courtland, and Walnut Grove including my kids. This is poor planning and disregard for our kids' elementary school that over 90% of the students are on free or reduced cost lunch.
771	Melinda Terry California Central Valley Flood Control Association	Concerns over levee stability and their performance during a seismic event is one of the purposes identified in the Notice of Preparation. However, DCP construction activities will involve intensive and sustained ground-shaking from hundreds of construction trucks on levee roads 24/7, numerous dewatering pumps, and millions of pile-driving strikes occurring in multiple construction sites that will adversely affect the stability of nearby levees. The sustained intensive localized vibration for such a long duration could cause stress fractures and possibly levee failures. The EIR should include technical analyses, data, and scientific research evaluating how the excessive pile driving during DCP construction will affect the integrity and stability of nearby levees and effects on the overall performance of the SPFC in a high water flood event. The cumulative effects of pile driving and dewatering on reducing levee stability and increasing land subsidence/sink holes in the DCP construction area should be acknowledged and mitigated in the EIR. A map should be included in the EIR depicting the locations of all pile driving for DCP facilities (including but not limited to intakes, forebays, pipelines, tunnels, shafts, sedimentation basins, barge loading facilities, etc.) and the radius of influence for any related land subsidence.
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	The DEIR must fully disclose the quantity of wells that are within the WaterFix2 footprint and analyze the impacts to and from all wells. Detailed comments and questions include: 1. How many oil and gas wells are known to occur in the Central and Eastern Tunnel Corridors? Estimated answer from CalGEM's WellFinder – NEW Intake: 1 Central: 1 Eastern: 0 Clifton: 0 ACTIVE Intake: 1 Central: 0 Eastern: 1 Clifton: 0 IDLE Intake: 1 Central: 1 Eastern: 4 Clifton: 0 PLUGGED Intake: 26 Central: 92 Eastern: 107 Clifton: 10 SUB-TOTALS Intake: 29 Central: 92 Eastern: 107 Clifton: 10 TOTAL 238

814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	How accurate are the well locations in the government's database? a. Older oil and gas wells are less likely to be where records may indicate. b. Water wells are very poorly located. c. What efforts will be done to actually locate wells in the pathway of the tunnel? d. Who will be responsible for locating wells?
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	How will wells be located if there isn't a surface feature that indicates a well? Answer: may have to use geophysics – metal detectors or magnetometers to locate and/or may have to start digging.
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	How far away from the actual pathway of the tunnel will wells have to be plugged or re-plugged or altered, and what analysis will be done to determine this distance? Will the project consider a buffer for all wells outside the footprint of the project?
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	What are the requirements for plugging a well in the path of the tunnel? To what depth will well casing have to be removed? What type of material will backfill or plug the well bore, i.e., cement grout? To what depth will the plugging be done? Who will oversee the re-working of a well, DWR, BOR, CalGEM? What are the potential problems with re-entering an old well? See recent problems with Chevron in Kern County. f. What monitoring of groundwater and surface water will be done to determine that the well plugging for the tunnel hasn't caused water pollution? Provide the minimum number and locations of surface water monitoring stations and groundwater monitoring wells needed to document background, tunneling operations and post-tunneling water quality conditions. What is the duration of water quality monitoring, pre-, during and post- construction? Who will bear the cost of this groundwater quality monitoring, pre-, during and post-tunnel construction? What are all of the environmental impacts that arise from plugging, re-plugging, or altering the oil, gas or water wells required by the construction of the tunnel?
814	AquAlliance, California Sportfishing Protection Alliance, California Water Impact Network	o Who bears the responsibility and costs for cleaning up any discharge of oil or gas well pollution caused by the tunneling? What are the responsibilities of the landowners? What are the potential environmental impacts to landowners? What mitigation measures will be implemented to make the landowner whole from an oil/gas spill or the remediation work? What are the responsibilities of the Lead Agency, the Bureau of Reclamation, and the WaterFix2 beneficiaries to investigate, plug, and mitigate oil, gas and water well impacts?
815	Gavin McCreary California Department of Toxic Substances Control	The EIR should acknowledge the potential for project site activities to result in the release of hazardous waste/substances. In instances in which releases may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

815	Gavin McCreary California Department of Toxic Substances Control	If buildings or structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with the California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Pain, Termiticides, and Electrical Transformers (https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance Lead Contamination 050118.pdf).
815	Gavin McCreary California Department of Toxic Substances Control	If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml handbook.pdf).
815	Gavin McCreary California Department of Toxic Substances Control	If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 Information Advisory Clean Imported Fill Material (https://dtsc.ca.gov/wp content/uploads/sites/31/2018/09/SMP FS Cleanfill-Schools.pdf).
815	Gavin McCreary California Department of Toxic Substances Control	If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 Interim Guidance for Sampling Agricultural Properties (Third Revision) (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf).
958	Jan McCleery	The DCA's latest Central Corridor design includes a new shaft on Byron Tract (near the Discovery Bay waterfront homes, new haul roads to it, and the tunnel route shown is at the corner of Discovery Bay near homes. That puts the tunnel alignment between our main sewer treatment plan (south of Highway 4) and our tertiary sewer treatment (north of Highway 4, far eastern side) and the DB water treatment plant. The water treatment treats water from our eight artisan wells which are 250 feet deep. In the EIR, analyze the risks and potential impacts to Discovery Bay from the construction noise and pollution.
958	Jan McCleery	Also analyze risks and potential impacts due to our sewer treatment, water, and homes in case of a tunnel collapse, explosion from hitting a gas pocket, etc. Or move the shaft and tunnel alignment back to where it was in the WaterFix design.

Table D-36. Comments Regarding Public Health

Letter	Commenter Name, Affiliation	Comment Text
235	Tim Stroshane Restore the Delta	In addition, removal of more fresh water from the Delta leads to salt water intrusion which will further spread harmful algal blooms (HABs) in Delta channels. Their growth will increase water treatment costs for the cities of Antioch, Pittsburg, Fairfield, Stockton, and West Sacramento, and our urban water agencies like Contra Costa Water District and Solano County Water Agency. HABs in Delta river channels and in reservoirs and lakes statewide is a growing concern as our climate warms. Their spread will reduce the public's enjoyment—including enjoyment by members of environmental justice communities—of public trust water bodies throughout the state. Potentially more HABs will make subsistence fishing more difficult and hazardous for those communities reliant on fish for an affordable and healthy component of their diets. HABs can threaten local drinking water supplies and increase costs for drinking water treatment for all water users, yet will impact environmental justice communities the hardest. In addition, the cyanobacteria from HABs can become airborne and exacerbate air pollution. Many neighborhoods surrounded by HABs in Stockton have been designated AB617 areas due to high rates of air pollution, and the fourth highest rate of asthma in the United States. These areas cannot sustain increases in HABs from reduced flows from climate change, let alone the operation of a Delta tunnel.
282	Tim Stroshane Restore the Delta	Public health impacts must include potential contribution of the proposed project to spread of harmful algal blooms of both construction and operations.
323	Jeff Balmores	As a result, our health is affected. Our life expectancy, which is 78.6 years, which is short, considering that most of us will retire in our sixties. For air pollution, we can easily breath in toxins and have respiratory problems such as asthma.
324	Miniya Jo Brisbane	We don't need any more poison in our water. So maybe if you won't hear my voice, you'll hear me wheezing as I'm struggling to breath. The air quality on its own is already bad enough, and you want to try to add bacteria from toxic algal blooms to the mix? Are you serious? To you all, it must sound like an angry teenager coming to yell at adults. But as someone who spent the first seven years of my life on inhalers and nebulizers, this is something I just can't stay silent on. I want to believe that you made this time to truly listen to the voices of central valley and the Delta. Because I'd hate to leave here thinking that I wasted my breath.
329	Nicholas Hatten LGBT Social Justice Initiative	We already know that these population's quality of life are less than Stockton, and that their actual expectancy is even less than their peers throughout the State of California.
337	Elaine Baret Little Manila Rising	I'm here today to advocate for the protections of our community of Stockton and the community surrounding the Delta. What would it mean to move forward with a project on the Delta without considering our community health and need? This would impact our home even more and change the course of our community's health.

353	Phillip Merlo San Joaquin Historical Museum	The barrage of Delta communities with drilling sound and the decline of local water quality which, of course, the City of Stockton relies on, will also lead to the flooding of our roads with diesel trucks. The public health field has reached consensus that noise, water, and air pollution lead to cardiovascular and cognitive health problems, as well as poor academic performance in students.
419	Michael DiMartino	So really quick, I'm here to talk about environmental toxins, the pesticides, the herbicides, the lowering of EPA standards that are affecting all of our health as we sit here. Like Barbara Daly mentioned about the use of Round-Up and glyphosate.
542	Bruce Campbell	Does DWR and/or the NOP preparers see a range of issues that could be health-related pertaining the NOP, or as stated on page 10 of 12 of the NOP, is the only possible public health consideration which deserves any attention to be thoroughly evaluated under CEQA "changes to surface water could potentially increase concerns about mosquito-borne diseases"?
736	Kelley Taber County of Sacramento	The County's significant local concerns include: Significant health impacts to County residents.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	So, to protect endangered species and public health, the Draft EIR must accurately and honestly disclose and assess the public health risks posed by the Project.
767	Kelley Taber City of Stockton	The EIR must evaluate the air quality and health impacts to Stockton residents, including the City's substantial environmental justice communities, of Project-related construction, including road and rail trips, and health risks to the City's water supply and residents resulting from increased frequency, magnitude and duration of HABs. The analysis must be adequate for the City and its residents to understand whether the health impacts of exposure to increased criteria pollutants and toxic air contaminant emissions will be more severe for low-income or minority communities that already suffer from disproportionate health burdens from existing levels of localized air pollution. The harm from air pollutants is not necessarily distributed equally throughout the region and may be more concentrated in communities immediately adjacent to large-scale industrial and commercial development and major transportation corridors and may more particularly affect certain segments of the population.
771	Melinda Terry California Central Valley Flood Control Association	Potential impacts related to DCP construction activities that specifically require more analysis, disclosure, and mitigation in the EIR: Evacuation plans for communities (residents, businesses, schools, tourists, etc.) in the Plan Area.

788	Jill North	To dig in the San Joaquin Valley where dirt is likely to contain the Valley Fever fungus doesn't make sense.
877	Katherine Wright River Delta Unified School District	River Delta Unified School District is concerned about the scoping of the Delta Conveyance Project. As the Superintendent I meet regularly with the Board of Trustees, my Cabinet and Administrative Team as well as facilitating stakeholder feedback meetings with teachers, school support staff, parents and community members. The Delta Conveyance Project raises grave concerns from all of these groups. From a maintenance of facilities standpoint, our custodial and maintenance staff is concerned about the increase of dirt and dust that will be produced from the project. This also raises concerns from our school nurses in our health services department because it will increases the chances of our students battling asthma to have breathing problems during the school day and also in their homes. Our teachers are concerned about the noise and traffic distractions the project will produced during the school day and during the evening hours when the children are doing their homework and attempting to get a good night's rest. They feel as if there are already too many factors in their lives that pull their attention away from their academic instruction that they do not need another one. The Cabinet and Administrative Team are concerned with the decrease in water quality for irrigation of our playing fields for our recesses, Physical Education instruction, and athletic programs. Additionally, they are concerned about the quality of the water their students will be drinking. Many of our schools are on fragile well systems and require a stabilization of the water table adjustments.
884	John David Hammett	I do not believe the current plan takes into effect any real and unbiased analysis of the following concerns: - Muck piles left on Delta islands. Where are the environmental studies to show the muck after it dries out will not be blown by the delta winds into the surrounding communities. What is in this dust?
889	Todd Scruggs	Muck piles left on Delta islands.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft: Muck piles left on Delta islands.
904	Janette Saale-Baehr	New impacts to Discovery Bay from the new, closer shaft: Indian Slough would be directly impacted, and affect boating traffic, as this is the main waterway to / from Discovery Bay.
907	Linda Hall	Disposing of the muck is another huge problem.
911	Milt Baehr	New impacts to Discovery Bay from the new, closer shaft: Muck piles left on Delta islands.
973	Laurie Yglesia	Muck piles left on Delta islands.

Table D-37. Comments Regarding Mineral Resources

Letter	Commenter Name, Affiliation	Comment Text
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	This project will be digging a tunnel which classifies it as mining and must follow mining regulations. One regulation is that core samples must be taken all along the track of the planned route. To complete this pre-assessment will cost a minimum of $1 billion. But if an issue comes up halfway way through the sampling, a new route will have to be determined and then new samples taken along the new route, now costing $1.5 billion, if nothing is identified as an issue on the new track. Considering the number of gas fields located in the Delta, it is unlikely that a simple track will be possible. Several fields have been identified by the state including Hood-Franklin Gas, Snodgrass Slough Gas, Thornton Gas, Thornton W Walnut Grove Gas, River Island Gas, East Island Gas, Rio Vista Gas, McDonald Island Gas, and Roberts Island Gas. Digging a tunnel through this area will be hazardous and has the potential for explosions. This would not be the first explosion with the construction of a water tunnel. The Sylmar explosion in 1971 killed 17 workers. During the construction of the Channel Tunnel between England and France, 10 workers died between 1987-1993. We request that all mining requirements and costs be included in the EIR. We request the EIR address all hazards and impacts associated with the surrounding gas fields.
718	David Strecker San Joaquin Farm Bureau Federation	This project will be digging a tunnel which classifies it as mining and must follow mining regulations. One regulation is that core samples must be taken all along the track of the planned route. To complete this pre-assessment will cost a minimum of $1 billion. But if an issue comes up halfway way through the sampling, a new route will have to be determined and then new samples taken along the new route, now costing $1.5 billion, if nothing is identified as an issue on the new track. Considering the number of gas fields located in the Delta, it is unlikely that a simple track will be possible. Several fields have been identified by the state including Hood-Franklin Gas, Snodgrass Slough Gas, Thornton Gas, Thornton W Walnut Grove Gas, River Island Gas, East Island Gas, Rio Vista Gas, McDonald Island Gas, and Roberts Island Gas. Digging a tunnel through this area will be hazardous and has the potential for explosions. This would not be the first explosion with the construction of a water tunnel. The Sylmar explosion in 1971 killed 17 workers. During the construction of the Channel Tunnel between England and France, 10 workers died between 1987-1993. We request that all mining requirements and costs be included in the EIR. We request the EIR address all hazards and impacts associated with the surrounding gas fields.

Table D-38. Comments Regarding Paleontological Resources

No comments identified.

Table D-39. Comments Regarding Environmental Justice

Letter	Commenter Name, Affiliation	Comment Text
174	Hildy Meyers	I am writing to oppose the single tunnel plan of the Delta Conveyance Project. This project would create new, unacceptable, environmental problems, including new environmental justice problems. It would not result in new water for cities and farms to the south of the Delta and would result in significant environmental damage.
191	Dr. Jeffrey Michael University of the Pacific, Eberhardt School of Business	Environmental Justice is not in the NOP bullet list of analysis areas-major oversight
196	Jasmine Leek Third City Coalition	Continue outreach to environmental justice communities across the state and listen to local leaders in impacted areas. The leadership of organizations like Restore the Delta, tribal communities, and others who will have to deal with the consequences should be taken seriously and revered. We are counting on you to listen to us when we say NO TUNNEL.
235	Tim Stroshane Restore the Delta	This letter also seeks to put before you a few key questions and our discussion of them:•With what water will future Delta tunnel and dams and reservoirs be able to operate?•Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?•With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?•Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?
235	Tim Stroshane Restore the Delta	The proposed Delta Conveyance Project (DCP) planning process remains behind on doing meaningful outreach to environmental justice communities from the Oregon border to San Diego. The Notice of Preparation for the new DCP proposes the Department of Water Resources' suggested scope of issues to be covered in the upcoming draft environmental impact report. It failed to include environmental justice and public health concerns as issues to be covered. We are aware that California Department of Water Resources consultants for the new DCP are gearing up to do more outreach on these and other topics. We are happy to see forward movement on environmental justice issues by DWR. But it is deeply frustrating to us that even after environmental justice issues were relevant to the demise of California WaterFix, that the State Water Contractors (including Metropolitan Water District) once again fail to prioritize the redressing of environmental justice grievances and issues.
282	Tim Stroshane Restore the Delta	An environmental justice section must be included studying the Eastern Contra Costa, San Joaquin and Southern Sacramento communities and the scope of construction and operational impacts to them.

322	Gloria Alonso	My name is Gloria Alonso, I am a nineteen-year-old woman, a Mexican woman immigrant. Coming from the south side of Stockton, I am here today as a community member to share my concerns regarding the impacts that the tunnel would have on the city that I call home.· I am here to share with you, not the numbers, but to remind you that they impact historically marginalized communities. As a daughter of Latino farmworkers who work in the central valley and who face language barriers, I am a representation of environmental justice communities, who bear the proportionate environmental impacts and risk from new developments like the tunnel. I am a Delta region resident. I am a person of color and low income student and family member. I am one of those who live in the quantifiable distressed areas, those who you can identify with a zip code 95206. Those who suffer from air pollution and water quality and water pollution, sorry -- water quality, we don't have that. But I, once again, did not come to tell you how my life is shaped by the numbers. I came to demand that you show us that you care. I came to demand that you show us and show my community democratic access. But more than that, to show us that you actually care about the nature in which we're living, to show us that the decision making process, that it's impacting the geographical area which I call home, has a way to achieve this development with an equitable approach. Because the lack of -- and going back to the history, because the lack of participatory design has showed us that it has the power to marginalize communities through the red lining policies. Because today we're here to prevent you from forgetting that without community input, public policy and urban and environmental design has the potential to neglect communities and prevent their access to public. They already lack the access to recreational spaces such as the Delta, makes the life in the south side an interesting area. But guess what? We know why it is this way. As I already said, we're standing here as the youth that lives and has survived formally the conditions and formally the red line neighbors. We're here surviving the environmental repercussions of the public policies that destroy our communities, which is how we know how I know that we are not constructing just the tunnel, but constructing the future of the environment and the future of historically marginalized populations.
426	Mario Moreno Hood Community Council	The Hood community is 60 percent Latino, over half aged -- over the age of 50. So those make an impact down the road, as you will see. A lot of the community members or -- have immigrated from Southern Colorado in a place called Manassa, Colorado, and La Jara, Colorado. And a lot of those community members still live in the Town of Hood. They're a Delta legacy community. There's a lot of heritage, and if you look in the County Assessor's Office, you will probably see names like Montano, which my mom is from, Cruz, Lujan, Chacon. They still live in the Community of Hood. And I make this point because a lot of them are up in age, and their siblings, like myself, who still live there. The impact is going to be great with not only traffic, air pollution with all the particulate matter, you name it. Noise being a big impact. And so I make this point with giving the heritage and the legacy of the community is because we're going to be so impacted.

542	Bruce Campbell	There is a major concentration of indigenous people in the lower Trinity (particularly the Hupa) and in the lower Klamath (generally Yurok) plus some (but not as concentrated) in mid-Klamath areas where some Karuk reside, but without a reservation. There was a lot more indigenous presence further up the mainstem Trinity watercourse, but especially those natives near gold-mining areas generally got wiped out entirely. However, there is a band or tribelet in the Little Hayfork area of Trinity County, but they do not have formal federal recognition. Natives along the Trinity and Klamath Rivers have been in the region for many thousands of years (often referred to by natives as "time immemorial") and their spiritual and cultural being relates to taking care of Creation and of the "relatives" (other species) – particularly the native anadromous salmon on which their spiritual and cultural and (at least formerly) nutritional lives are/were based.
571	Karen Jacques	The EIR should analyze impacts on environmental justice communities of which there are several in the Delta both during and after construction.
627	Nichelle Garcia	The EIR must include an environmental racism analysis to determine if the environmental burden of this project will disproportionately fall upon people of color and Indigenous people.
711	Farm Bureau Delta Caucus: Contra Costa County Farm Bureau, Sacramento County Farm Bureau, San Joaquin County Farm Bureau, Solano County Farm Bureau, Yolo County Farm Bureau	Disadvantaged communities. While the State keeps touting about how it is providing resources to protect disadvantaged communities especially with water quality, air quality, and other health aspects, this project will do just the opposite. Many of the residents in the Delta are farm laborers. Most of the children in the schools receive free or reduced cost lunches. The drinking water for these residents will either be cut off or contaminated by this project. In previous proposals, nothing was mentioned about providing clean water for residents whose water wells end up compromised. Basic services including fire, medical, and access to goods will be compromised. These need to be addressed in the EIR and have money available to mitigate those disadvantaged families.
718	David Strecker San Joaquin Farm Bureau Federation	Disadvantaged communities. While the State keeps touting about how it is providing resources to protect disadvantaged communities especially with water quality, air quality, and other health aspects, this project will do just the opposite. Many of the residents in the Delta are farm laborers. Most of the children in the schools receive free or reduced cost lunches. The drinking water for these residents will either be cut off or contaminated by this project. In previous proposals, nothing was mentioned about providing clean water for residents whose water wells end up compromised. Basic services including fire, medical, and access to goods will be compromised. These need to be addressed in the EIR and have money available to mitigate those disadvantaged families.
720	Eric Gillies State Lands Commission	The NOP does not state whether DWR intends to discuss and analyze potential environmental justice related issues, including an assessment of public access and equity implications and who would bear the burdens or benefits from the proposed Project. Commission staff believes the Draft EIR, as an informational public document, is an appropriate vehicle to disclose and discuss how the proposed Project would attain or be consistent with DWR's equity goals and statewide policy direction.

729	Erik Vink Delta Protection Commission	Promote environmental justice in the Delta. The Delta's multiracial population is often at as much risk as the fish who swim past their communities. Too many residents and workers have low incomes. To reach jobs and conduct other daily activities, many rely on Delta roads that will be impacted by project-related congestion. Others rely on water-dependent farms and tourism that the project will harm. Those who live or work in Hood, Clarksburg, Courtland, Locke, or Walnut Grove may have their lives disrupted by noise, traffic, and other disturbances for years by a project that benefits only others far away. All suffer the stress of decades of State water and ecosystem planning efforts that threaten to harm Delta resources and upend its way of life. The ESP reported that the age and household composition of the Delta's population is younger and with larger families than is California as a whole. Over a quarter are children younger than 18 years old. In contrast, the population of the primary zone is composed primarily of older people without children, living in smaller households. Most Delta residents describe themselves as white or Hispanic, with the next largest ethnic groups being Asian, other races, and African American or black. About one-third describe themselves as Hispanic. Areas with concentrations of lower income residents include Stockton, Walnut Grove, Locke, Courtland, Clarksburg, and Hood. Government Code section 11135(a) provides that no person in California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by any state agency, is funded directly by the state, or receives any financial assistance from the state. This provision requires agencies to consider fairness in the distribution of environmental benefits and burdens, so that they (a) foster equal access to a clean environment and public health benefits; and (b) do not cause unmitigated concentration of polluting activities near low income, minority, or other at-risk communities, such as those in the Delta affected by this project. Provisions of CEQA and its guidelines, including CEQA Guidelines § 15064(e), require that lead agencies consider how the environmental and public health burdens of a project might specially affect these communities. The BDCP/WaterFix EIR did not include a section addressing how the project considers environmental justice in the Delta. This EIR should, including updated analysis of demographics, income levels, and other protected characteristics of communities that the project impacts. Disruptions in community character, lost housing, noise, lost recreation opportunities, traffic that impedes travel to employment, damage to cultural resources, or other impacts that cause disproportional impacts on children, the aged, racial minorities, lower-income or other protected populations, should be highlighted.

729	Erik Vink Delta Protection Commission	Mitigate environmental justice impacts. Measures should be proposed to avoid, reduce, or compensate for disproportionate impacts. The best way to do so would be to adopt the Commission's recommended alternative for continued through-Delta conveyance rather than building an isolated tunnel. Another way is to carefully mitigate community disruption, noise, traffic congestion, and damage to agriculture, housing, recreation, and cultural resources, as described in our comments on those issues. Other feasible measures could provide some project-related benefits for Delta residents. Some could be adapted from those adopted to protect southern Californians harmed by the LAX Master Plan. 1.Create and utilize existing resource centers to assist historically under-represented and at-risk Delta residents to find construction and other substantive jobs with the project during both its construction and operation. Also, create a community database of project-related job opportunities by coordinating data gathering, outreach, and counseling through the following: •Research and assess existing specialties and current capabilities of existing workforce to assist with targeted training and outreach efforts. •Develop and maintain a complete data base of minority contractors •Produce a data base of potential jobs and specialties needed to assist in targeted training and outreach efforts. •Produce a data base of potential jobs and specialties needed and disseminate the information through the communities affected and to minority business enterprises •Commit to hiring Delta-area residents to ensure that there will be benefit to the local population. 2.Include community participation, including a diverse group of residents, stakeholders, environmental scientists, and community leaders, in monitoring the implementation of the project's MMRP, including regular meetings, to ensure agency compliance and accountability. 3.Workwith local school districts to provide educational and trade training for project-related careers, targeting students in affected communities to provide them with increased career opportunities in water management, engineering, and environmental sciences.4.Work with local school districts to offer curricula about water, engineering, agriculture, environmental sciences, and Delta history and culture at elementary schools, middle schools, and colleges of affected communities. Finally, other local, project-related benefits could be provided by contributing funds to the Delta Investment Fund (PRC section 29778.5) to invest in public facilities, expand and implement the Commission's Delta Community Action Plan project, or support agricultural, cultural, recreational, or tourism programs and projects.
752	Amber McDowell Double M Farms	Disadvantaged communities. While the state keeps touting about how it is providing resources to protect disadvantaged communities especially with water quality, air quality, and other health aspects, this project will do just the opposite. Many of the residents in the Delta are farm laborers. Most of the children in our schools receive free or reduced cost lunches. The state has shown no concern for these disadvantaged communities with this project that they know will harm the residents and the Delta region as a whole. Impacts need to be addressed by the state and have money available to mitigate any impacts from this project to all Delta families.

767	Kelley Taber City of Stockton	The proposal to locate a tunnel corridor closer to Stockton and rely on Interstate 5 and locations within the City for construction-related activity raises significant questions as to whether the Project will disproportionately impact vulnerable subpopulations. CEQA and California courts recognize that in assessing impacts, the significance of an activity depends upon the setting. The EIR must fully and adequately analyze the impacts of projected increases in pollution on communities that are sensitive or already overburdened with pollution, and impact determinations must account for the characteristics of the affected population.
793	Rebekah Olstad	The EIR must include an environmental racism analysis to determine if the environmental burden of this project will disproportionately fall upon people of color and Indigenous people.
853	Susan Alexander	The EIR [why is this EIS and other references are EIR?] must include an environmental racism analysis to determine if the environmental burden of this project will disproportionately fall upon people of color and Indigenous people.

Table D-40. Comments Regarding Climate Change

Letter	Commenter Name, Affiliation	Comment Text
4	Art Herbert	How can you protect from rising sea levels when you diver water away from the delta? You just increase the salt water flow into the delta.
10	Jim Blickenstaff, Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	…the specific and cumulative effects b> Projections of all the real and growing, future climate change/sea level rise negative impacts – up to the year 2100,
21	Karen Huss Sac Metro Air District	Discuss project consistency with the Department of Water Resources' Climate Action Plan (CAP) and applicable climate regulations and Executive Orders adopted since the CAP was prepared, with particular attention to AB 2800iii, AB 1482iv and Executive Order B-30-15v.
29	Hope Salzer	The EIR must analyze the tunnel's cumulative and collective impacts, with particular focus on: global climate change impacts;
130	Barbara Mauk	PLEASE DO NOT PUT NORTHERN CALIFORNIA'S RIVERS AT FURTHER RISK - CLIMATE CHANGE HAS TAKEN AND WILL CONTINUE TO TAKE ITS TOLL.
140	Daniel Muelrath Diablo Water District General Manager (Sent on behalf of DWD Board of Directors)	Evaluate the greenhouse gas (GHG) emission of the Delta Conveyance Project, which has a cumulative impact on the entire State Water Project (SWP). Demonstrate how the SWP is going to meet the state's 80% GHG reduction target by 2050.
145	Meredith Cooper	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: global climate change impacts
195	David Fries Conservation Chair San Joaquin Audubon Society	Impacts on the Delta caused by climate change and sea level rise must be considered at least until the year 2100.
201	Kristen Oliner Restore the Delta	The effect of climate change requires an updated and monitored assessment of conditions in the Delta now and frequently in months and years ahead.
204	Raven Stevens We Advocate through Environmental Review (WATER)	How does climate change play into this project? Overall, scientists agree that there will be less snow pack and therefore less fresh water flowing into our creeks, streams and rivers.
226	George Zdasiuk	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of water in the Delta.

227	Franz Steiner	And finally, the state of California needs to be planning for the rise in sea levels which will increase the penetration of salt water past the city of Antioch and require the raising many of our levees.
235	Tim Stroshane Restore the Delta	The Fourth California Climate Assessment (4CA) was largely ignored by the Draft WRP. This leaves us with the disturbing impression, which we conveyed to the state in our February comments on the Draft WRP, that DWR regards the 4CA with contempt and ignores water-related findings from its supporting studies provided by some of its own scientists and modelers when it comes to formulating future water strategies for our state.
240	Tim Ellenberger	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of water in the Delta.
248	Tom Williams	Provide quantitative estimates of "Climate Changes" for the life-of-project (e.g., 50 years) and increased variability (Coefficients of variation, standard deviations/errors for norms, +/- 4-5-6thSD for Higher-Storm/Lower-Drought flows.
265	Molly Culton Sierra Club of California	The EIR must analyze the tunnel's cumulative impacts with particular focus on global climate change impacts…
270	Kyle Griffith Californians for Water Security	We know that climate change is going to impact the way that California receives its water. We can no longer rely on the Delta snowpack or the Sierra snowpack to release water slowly. We're anticipating that water is going to be delivered to the state in more precipitation and rain, and our current water system is currently unable to accommodate moving these waters or this water where it's needed when it's in abundance.
292	Bruce Campbell	Please evaluate the impact of each alternative not only in regards to carbon emissions during construction and during operation of the tunnel, but also in regards to approximate current and likely future production of oxygen in the Sacramento San Joaquin Delta as well as the upper San Francisco Bay Delta region in general
303	Robert Hunter Municipal Water District of Orange County	Climate change impacts on water resiliency and the ability to recover are key components of water resource planning. And like climate change responses, the Delta Conveyance Project and EIR should not be based on political beliefs, but on sound science, engineering, and economics.
310	Charles Wilson Southern California Water Coalition	As was mentioned earlier, the climate change impacts from reduce of snowfall, increase flows with rain. It's important how we modernize the system, where we put the intakes, and the size of the facility. All of these things go into serving over half the state's population as well as some of the business interests you've heard from today.
327	Jasmine Delafrost	The tunnel fails to address that climate change is these communities.
328	Niria Alicia Garcia	There's so much lingo in there about climate change. I want to see the scientific analysis and the scientific studies that prove that this is actually a climate change because our language from our climate justice movement has been incredibly co-opted, and we're not going to be fooled. Period.

332	Earl Jones	This project is intended to address climate change. I don't think you're considering it adequately. I further don't think that you're able to consider it adequately at this point, because climate change is an ongoing thing; and we have no idea how far and in what directions it will take us until we see what the planet does or does not decide to do about it.
340	Dan Nomellini, Jr. Central Delta Water Agency	But now, I believe they're taking the gloves off and they're coming out and saying, yes, our plan is to abandon maintaining Delta water quality in the wake of sea level rise. So now they're claiming with sea level rise, there's going to be greater intrusion of salinity, and their solution, as I understand it, and I'm waiting to see how much they admit it; but their solution is not to release more fresh water to keep the Delta fresh, which half a century of laws and promises were made to ensure that they would. Instead, their plan is to take that water that we need to keep the Delta fresh and put it in the tunnel. And so that's devastating to our area.
343	Margo Praus Sierra Club of California Member	One of your primary rationales listed is sea level rise. It's an interesting image that we're worried about the sea level rise and how it will affect the pumping station. But we're not really addressing how it will affect our valley and our low lying areas. It needs to be addressed. And I know that's not in your scope, but it ought to be part of the whole picture.
351	Dave Fries National Audubon Society, San Joaquin Chapter	Impacts by climate change must be considered at least to the year 2100.
355	Dr. Mark Rockwell Fly Fishers International, Northern California	The EIR must analyze the tunnel's cumulative impacts, with particular focus on: • global climate change impacts.
391	Meg Giberson	Climate change impacts should also be considered thoroughly in the NOP.
392	Katja Irvin	At least 10 percent of our electricity use in the state is just for moving water. And this is just perpetuating that, and how is that going to allow us to reach our climate goals?
484	Raven Stevens We Advocate through Environmental Review (WATER)	Lastly, how does climate change play into this project? Overall scientists agree there will be less snow pack like this year, and therefore, less fresh water flowing into our creeks, streams and rivers. In the EIR you must include how this project works when there is less recharge water flowing into these river systems.
505	Lenora Clark	We are concerned with the lack of surety that the plan will address the threat to climate change.
518	Mariah Looney Restore the Delta	The tunnel fails to address the impact from climate change, including more frequent floods and longer droughts that contribute to polluted waters throughout our communities. The tunnel will diver fresh water from supplies from Stockton's drinking water, making water treatment more expensive.

542	Bruce Campbell	A “thorough evaluation” of climate change will necessitate: 1. Thoroughly evaluating everything from impacts from water diversions in those “Upstream of Delta” areas such as the Trinity complex and the Shasta Dam territory; 2. carefully evaluating likely climate impacts from seriously reducing outflow to San Francisco Bay and the Pacific Ocean if the DCP becomes reality (and how that would impact both climate and the entire food chain of that greater region which includes the LARGEST ESTUARINE DELTA ALONG THE PACIFIC COAST in either North or South America) including its oceanic impacts; 3. Examining the impacts to climate that may occur if there is less water in much of the Delta, and whether climate is further impacted by the increase in toxic algae in the Delta; and last but not least 4. carefully examining the impact that at least 23 years of major construction activity would have on greenhouse gas emissions in the region, including approximate amounts and varieties of fuels and lubricants that would be used for the construction equipment. Will there be attempts to get alternative fuels to things like DIESEL powered equipment since the diesel formulation contains over 40 known carcinogens?, be it gasoline or natural gas-powered, and whether it is powered otherwise. Will there be any attempts to control “black carbon ”emissions relating to DCP construction activities or to seek equipment that does not emit that serious greenhouse gas (?) – seeing that “black carbon” has especially deleterious effects on local and global climate.
561	Diane Riddle State Water Resources Control Board	The EIR should include analyses of the Project with appropriate assumptions based on the latest science for expected climate change effects upon initial operations and other relevant time periods in the life of the Project. The analyses should be presented in a manner that allows for the effects of the Project to be discernable from the effects of climate change. Scientific studies have suggested that climate change will bring changes in precipitation patterns (from more snow to more rain), higher temperatures, vegetation expansion, and longer growing seasons, which would result in warmer water temperatures and lower annual streamflow than the current conditions. Previously, the EIR/EIS for BDCP/WaterFix included climate change scenario Q5 (BDCP/WaterFix Final EIR/EIS, Appendix 5A Section D: Additional Modeling Information), which forecasted slightly wetter and warmer conditions than current conditions. However, precipitation variation and temperature rise may be much more severe than the Q5 scenario. The EIR should consider climate change scenarios with warmer and drier conditions (with drought sequences similar to those that were experienced from 2012-2016). In addition, the EIR should evaluate possible sea level rise scenarios. The sea-level rise assessment reported by the Working Group of the California Ocean Protection Council Science Advisory Team (OPC-SAT)8suggested the median sea-level rise at the Golden Gate would be 0.9 feet(ft)by 2050. The report also suggests that there is a 1-in-20 chance (5% probability) that sea-level rise will exceed 1.4 ft by 2050with the possibility for more severe sea level rise by 2100 of 1.6 ft to 10 ft.

571	Karen Jacques	The EIR should include a detailed study of what is likely to happen over at least the next 50 years as the climate warms and changes and sea level rise occurs. This should include detailed analysis of the data and conclusions of the Fourth California Climate Assessment and how those changes will impact operation of the tunnel and water available to be exported south while still leaving a functioning ecosystem in the Delta which is already under extreme stress due to the amount of water currently exported.
697	Delta Independent Science Board	Comments on WaterFix Final EIR/EIS to consider in Delta Conveyance EIR: Given the considerable uncertainty in the degree and timing of sea level rise and other aspects of climate change, it remains surprising that there is not a more targeted discussion and analysis of the sensitivity of the relative long-term performance of alternatives with respect to various aspects of climate change. This is a critical omission. Reductions in groundwater overdraft as part of the SGMA will likely increase demand for water from the Delta, the primary and historical source of supplemental water for the southern Central Valley, the state's primary overdraft area. Uncertainties in the interaction of SGMA implementation with Delta alternatives are likely to significantly affect the relative implementation, water supply, and environmental performance of alternatives. Climate change: Even though Alternatives 4A, 2D, and 5A do not seek 50-year incidental take permits (p. 11), there will be long-term impacts and effects of climate change. "Too much uncertainty" about such effects is not a reason to ignore the topic.
698	Steve Lambert Butte County Board of Supervisors	Address impacts from climate change. Consider the most recent versions of the California Climate Assessment. Fully evaluate the water supply reliability and other implications from climate change.
701	North Coast Rivers Alliance, Institute for Fisheries Resources, Pacific Coast Federation of Fisherman's Associations, San Francisco Crab Boat Owners Association, Save California Salmon, Winnemem Wintu Tribe	DWR must examine both whether the Project will be able to physically withstand the rising sea levels at the proposed intake locations and whether the Project would remain feasible at the higher rates of sea level rise predicted over the long term. Indeed, DWR must consider this concern carefully as all indications are that it would not. DWR must not artificially divorce hydrologic modeling from infrastructure design, nor can it assume constant fresh water intake, in light of overwhelming scientific evidence indicating saltwater inundation. DWR must disclose whether the Project's potential diversion points will take in saltwater over the anticipated life of the Project, and how its operation would upend the water quality of the Delta due to increased salinity.
702	Frank Toriello We Advocate Through Environmental Review	Lastly, how does climate change play into this project? Overall, scientists agree that there will be less snow pack and therefore less fresh water flowing into our creeks, streams and rivers. A new study is reporting on the drought that has scorched western North America for the better part of two decades, withering crops, draining rivers and fueling fires. Scientists warn that this trend could be just the beginning of an extended mega drought that ranks among the very worst of the past 1,200 years and would be unlike anything known in recorded history[4]. Surely the wisdom of diverting depleted water flows to desert regions must be questioned should this mega drought become a reality. This scenario must be addressed in the EIR.

705	Roger Mammon	With climate change and projections of less snowpack and more precipitation, where will the water come from to fill the tunnel?
710	American River Water Agencies (Carmichael Water District, City of Folsom, City of Roseville, City of Sacramento, El Dorado Irrigation District, Placer County Water Agency, Regional Water Authority, Sacramento County Water Agency, Sacramento Suburban Water District, San Juan Water District)	It is particularly important for the EIR to analyze the Project's effects on Folsom Reservoir and the American River in light of climate change. The NOP identifies that one of the Proposed Project's potential environmental effects would be the following: "Climate Change: increase resiliency to respond to climate change."(See NOP, p. 10.)This potential effect, however, appears to be concerned only with the delivery of water to areas served from the Delta by the SWP and, potentially, the CVP. In considering the potential effects of climate change, the EIR for the Project must consider the effects of climate change on upstream water supplies and environmental conditions like those associated with Folsom Reservoir and the American River as a result of changes in precipitation patterns and the Sierra Nevada's snowpack.
720	Eric Gillies State Lands Commission	Commission staff recognizes the importance of California's transition from traditional energy generation to renewable energy generation, consistent with the state's bold target of 100 percent "zero-carbon" energy procurement by 2045 (Senate Bill 100, statutes of 2018). Nonetheless, Project construction could potentially result in significant impacts due to greenhouse gases (GHGs)produced during construction. Therefore, DWR should ensure a GHG emissions analysis consistent with the California Global Warming Solutions Act (Assembly Bill [AB]32) and required by the State CEQA Guidelines is included in the Draft EIR. This analysis should identify a threshold for significance for GHG emissions, calculate the level of GHGs that will be emitted as a result of construction and ultimate build-out of the Project, determine the significance of the impacts of those emissions, and, if impacts are significant, identify mitigation measures that would reduce them to the extent feasible.
745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	Quantification is required by the both the Delta Reform Act and the Governor's Executive Order. Water Code section 85320(b)(2) requires "a comprehensive review and analysis of all of the following:" (C) The potential effects of climate change, possible sea level rise up to 55 inches, and possible changes in total precipitation and runoff patterns on the conveyance alternatives and habitat restoration activities considered in the environmental impact report.

745	Sierra Club of California, AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Water Caucus, Planning and Conservation League, and Restore the Delta	The Draft EIR Must Evaluate the Tunnel Project in light of Climate Change The Draft Portfolio notes some impacts Climate Change will have on the Delta. “Rising winter temperatures will reduce mountain snowpack in the Sierra Nevada and Cascade ranges by 65% on average by the end of the century, increasing flashy winter run off and flood risks while reducing spring and summer stream flow.” (Draft Portfolio 14.) Additionally, “San Francisco Bay and the Sacramento-San Joaquin Delta will face salinity intrusion as sea level rises” due to climate change. (Draft Portfolio 14.)“Although the Delta is not one of the state’s ten major hydrologic regions, it plays a complex role in the water resilience of California and faces particularly acute climate risks.” (Draft Portfolio 110.) The new federal policy to maximize exports will further decrease freshwater flows, and the Tunnel Project will further reduce freshwater flows through the Delta. So the proposed project will worsen the Delta’s poor freshwater flows, water quality, and harmful algal blooms. These issues need to be addressed in the Draft EIR to allow informed development and consideration of alternatives responsive to the problems. That will include reducing exports and staying with through Delta conveyance to by that way increase freshwater flows through the Delta to compensate for declining watershed runoff and worsening salinity intrusion.
748	Santa Clara Valley Water District (SCVWD)	Since one of the key potential benefits of the Proposed Project is to protect water supply reliability from the impacts of sea level rise on water quantity and quality, Valley Water requests that DWR analyze both a no action alternative and a project alternative using the most up-to-date, but not too speculative, projections for sea level rise. We understand it is too speculative, and therefore, inappropriate to analyze sea level rise scenarios that would overtop existing levees, for example, in a CEQA/NEPA context due to the vast number of unknowns, such as whether levees will be raised and how beneficial uses may be reassessed.
748	Santa Clara Valley Water District (SCVWD)	In addition to modeling Proposed Project impacts under the less speculative climate change projections, for purposes of assessing the potential benefits of the Proposed Project, and to ensure facilities are sited and designed to be able to adapt and continue to provide benefits in the event sea level rise is greater than assumptions used to model the Proposed Project impacts, we encourage DWR to qualitatively evaluate up to 10.2 feet of sea level rise at the Golden Gate Bridge in 2100.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	EO Climate Change and Other Assumptions the Delta Conveyance Project and Other Water Resiliency Portfolio Projects Must Address: • "shorter, more intense wet seasons that worsen flooding • "California continues to grow. with our population projected to grow to 50 million"

753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	Climate change is a global problem and cited as the primary driver for the need to "restore and protect SWP water supplies". This defines the project as a response to a problem which is global in scope and yet the project attempts to (incorrectly) limit the range of appropriate project alternatives to those implemented only in the "Delta". If climate change is a global problem, the delta consists of only 0.0005% of the surface area of it. Surely the SWP's water supply reliability "and restoration" cannot be solely dependent upon the Delta 0.0005% geographic area as the sole solution. In the face of reality of climate change impacts to water supplies all over the world, why would it be a reasonable proposition for the project to "restore water supplies" to some unspecified earlier unaffected date and time when everyone else in the world is being forced to adapt to new climate and precipitation patterns.
755	Jim Blickenstaff Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	Current and projected future environmental base lines -- independent of any project -- need to be thoroughly developed in the context of evidence of accelerated Global Warming, in as much as that base line directly effects and exacerbates most if not all, negative impacts of the project. The best science available will be critical on this, since just within the last few years the temperature and related impact parameter predictions on climate change have significantly increased. This notably includes, of course, an accelerating rise in sea level. Some projections are now showing a 6' rise by 2100. And, a global temperature rise, from 2018 estimates of around 5 degrees, to new model estimates of up to a 10 degrees increased Acceleration - - in this case, a profound indicator that certain tipping points may have already been passed. Scientists have been relatively conservative about climate change projections, not wanting to be seen as being alarmists. The result has been that past climate modeling predictions have invariably underestimated the probable increase in the range of global warming temperatures. A consequence of caution portends a dynamic that future modeling will also trend toward further increases in global temperature projections. Analysis for this project will need to encompass the very real possibility of the additional negative impacts from this phenomenon. There are -right now- numerous indicators of severe environmental stress on the Delta : From more algae blooms, several aquatic species in historic decline -- some either now extinct, or on the precipice of extinction -- warmer water, more brackish water, and more polluted water.
781	Janet Wall Wintu Audubon Society	Climate change implications must be addressed.
787	William Huber	Warm water kills fish. We are experiencing a warming climate from anthropomorphic climate change. The Sites Reservoir plan will further degrade the watersheds of the Sacramento, and Klamath Trinity, by drawing down Trinity Lake, heating the outflow from Lewiston Dam in the process, to say nothing of the heating and concomitant water loss by evaporation from a proposed Sites reservoir which will be a bathtub reservoir like San Luis Reservoir to further impound waters of the Trinity River by dint of the mega plumbing that is the California Water Project, and The Central Valley Project.
819	Clyde B. Thorington	There must be a plan to ensure the Delta infrastructure will not only be preserved, but improved. The plan must also address the threat that climate change and increased water transfers pose to the amount and quality of the water in the Delta.

824	Christine Ellis	DWR must carefully research how taking water away from a region will affect the region's climate.
853	Susan Alexander	The EIR must analyze the tunnel's cumulative impacts, with particular focus on global climate change impacts
830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	CLIMATE CHANGE ANALYSIS SHOULD ACCOUNT FOR THE FULL RANGE OF POTENTIAL IMPACTS, INCLUDING THE NORTHERNMOST PART OF THE UPPER SACRAMENTO WATERSHEDS The availability of water downstream and from Shasta Reservoir depends greatly on the water from the Medicine Lake Highlands Aquifer. This aquifer is highly sensitive to changes in climate, especially droughts and declining snowpack. As climate changes, this water source will be impacted, greatly affecting water availability downstream. DWR needs to account for these dry periods as a new normal, something that has been repeatedly stated by multiple state agencies. Avoiding a full assessment of climate change impacts is inconsistent with a range of California regulations. Water availability can change with warmer temperatures. One climate change model for the region found that the decrease in total annual precipitation is highest by 2100 in upper elevations (as much as 0.15 inch/yr decline) and decreases towards lower elevations (0.07 inch/yr decline). This study found that with climate change, significantly more water is leaving the watershed as evapotranspiration rather than groundwater recharge. This study found that by 2100 precipitation would decrease by 5%, recharge would decrease by 12% and April 1st snowpack would decrease by 62%. The amount of average total groundwater recharge at the basin scale then decreases from the historic to projected time period from 17.4 inches/yr to 15.4 inches/yr. Sustained drought is likely the Medicine Lake Highlands' primary vulnerability. The 2014 drought and lowered precipitation before that period caused volcanic aquifer storage to decline from high mid-1990s. As reflected in late summer base flow river discharge, up to 50% decrease in spring output in Hat Creek Valley was observed in the 1987-1992 drought. Even though impacted, compared to other surface and groundwater systems in California, the volcanic aquifers protected downstream fisheries and agricultural producers from what could have been much worse conditions. Although storage levels in Shasta Lake Reservoir fell well below their historical averages during 2014 drought, inflows from the Upper Sacramento, McCloud, and Pit Rivers were sufficient and supplied about 10% percent of total year's storage behind Shasta Dam. During the 1987-1993 drought spring discharge supplied a similar proportion of Shasta's storage during that period, whereas in the 1976-1977 drought spring flow accounted for up to 30% of the needed supply in Shasta. The system also responds quickly to a break in drought. The period from 1965 through 2006 produced a nine percent increase in precipitation, and a 19 percent increase in Fall River's base flow. Protecting the Medicine Lake Highlands will likely need to be a solution the State takes on to prepare the water supply system for future climate are rising populations in the south that depend on this water. However, as noted by Gary Freeman, Principal Hydrologist for PG&E, aquifer outflows to the Fall and Pit Rivers from volcanic aquifers such as the MLH have declined significantly221, indicating an impact to the groundwater system that warrants attention from the state and other land use agencies. From 1999 to 2014, the flow was reduced by a total of 2.4 million acre-feet or 782 billion gallons.

933	Charles Robinson	* Include modeling of future water availability and needs including the effects of climate change.

Table D-41. Comments Regarding Grown Inducement

Letter	Commenter Name, Affiliation	Comment Text
10	Jim Blickenstaff, Former San Ramon City Council Member, Chair, Mt. Diablo Sierra Club of California	…the specific and cumulative effects c> Finally --and most importantly for this document-- add an evaluation of all the negative impacts from plans for a huge tunnel that will further facilitate, the historic southern bias for more, always more, Delta fresh water -- also, up to the year 2100.
242	Jack O'Laughlin	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of water in the Delta and in San Francisco Bay.
246	James R. Sadler	The plan must address the threat that climate change and increased water transfer pose to the amount and quality of water in the Delta.
746	Friends of Stone Lakes National Wildlife Refuge	Growth inducing aspects of freeway interchange improvements must be evaluated. The DCA is also contemplating improvements to Interstate 5 interchanges at Hood Franklin Road and Twin Cities Road, as well as a completely new Interchange at Lambert Road. Any proposed improvements must be evaluated for their growth inducing impacts, particularly in relation to freeway related commercial development such as truck stops.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The EO growth assumption (and Delta Conveyance Project Purpose) to "restore and protect the reliability of SWP water deliveries" identifies that the Delta Conveyance Project will support increased and long-term hardened demand water supplies from project facilitated population growth. The project supporting increased future population water supplies is a Growth Inducement impact the Delta conveyance Project EIR must disclose; determine the magnitude, location, timing and nature of growth induced; analyze; and mitigate those Growth Inducement impacts.
753	S. Dean Ruiz Central Delta Water Agency and South Delta Water Agency	The project must include as an alternative to the Delta Conveyance Project that anticipated future population growth would or should occur in areas at the origin or nearer to the water supply. Assuming people move to or future population growth occurs in areas that require less vulnerable and expensive infrastructure with less environmental impacts is a much more reasonable, less expensive, less vulnerable, and less environmentally damaging project alternative than currently proposed by the Delta Conveyance Project.

Table D-42. Comments Regarding Tribal Cultural Resources

Letter	Commenter Name, Affiliation	Comment Text
61	Janice Gloe	It is only right for you to consult with Chief Sisk of the Winnemem Wintu Tribe! Chief Sisk speaks the truth and has the wisdom to share with you about the long term damage that the tunnel will create! It is only right to show respect for and to consult the original peoples of this land which is named California upon which we are guests!
130	Barbara Mauk	I also stand with the Native peoples whose lives will be adversely impacted if this misguided plan proceeds.
135	Bayla Greenspoon	I attended the scoping meeting in Redding on March 2nd and heard eloquent speeches about potential consequences of this proposed water grab. The speakers were youth and elders, men and women, Native and non-Native, recreational and commercial river users, and members of Tribes who live along the rivers, their life-ways. THERE WAS NOT ONE COMMENT SUPPORTING THIS PROJECT. What I heard was impassioned declarations from people whose ancestors have lived here for 1,000s of years, in harmony with the land and resources. Over and over we heard testimony that this project will amount to cultural genocide for the Tribes along the river!
135	Bayla Greenspoon	What will be the cultural and economic consequences for the Tribes who depend on the rivers for the fish and for their spiritual practices? The EIR is supposed to address cultural resources. The rivers, water and fish ARE the Tribes' cultural resources. Please address: a. How many Tribes are expendable? Is cultural genocide an acceptable consequence of this project? OR… b. What measures can be put in place to ensure the maintenance and even increase of the health of the rivers? c. Consider a "no-project" alternative to mitigate these issues.
146	Rachel Huang	We also denounce the proposed tunnel project, which will seriously endanger the four extant Sacramento and American River Chinook salmon runs that Winnemem Wintu (WW) tribe desperately need as Chinook Salmons are an essential part of WW tribe's culture and livelihood.
167	Tracey Licerio	How will you be acknowledging the traditional and cultural practices of the Winnemem Wintu people?
167	Tracey Licerio	How will this impact the cultural, social, and spiritual beliefs of the local American tribe in Shasta County and in the Central Valley?
204	Raven Stevens We Advocate through Environmental Review (WATER)	IN order to make real change, your agency must always consult with, learn from and follow Indigenous leadership.
208	Morgan Lindsay	Respect the full sovereignty of all Tribal Nations of the total Sacramento River watershed
208	Morgan Lindsay	Consult with federally recognized tribal governments and elders and youth.

209	Kylee Sorrell HUHS Water Protectors Club	My people, the Hupa, live and survive off the river. Stop hurting native people for profit. We (Hupa) barely have water and we can't give any more to corporations.
210	Anna Powell	Project has a direct effect on tribes who rely on Trinity as well as Klamath River.
212	Pat Lind	Respect the tribes. Tunnel goes against indigenous rights.
217	Allesandra De La Torre	Need tribal involvement in the project for water preservation, cultural resiliency, and salmon health.
218	Gino O'Rourke	Land rights for water to indigenous people have never been compensated.
271	Isaac Kinney	You can't just include federally recognized tribes in this discussion. You need to include locally and state, regional recognized tribes as well, and to make sure that the cultural resources management plans include not just again, consultation, but decision-making from the tribes. So including, because of how California was taken for gold in 1849 by executive order, there is still a lot of aboriginal title tribes hold onto. So making sure that tribes are decision-makers, not just stakeholders.
281	Monique Sonoquie	Meet with each and every tribe and get full consent from each and every tribe in order for this project to go through.
285	Anon	Involve local, regional and federally recognized tribes
408	Allie Rosenbluth, Rogue Climate	Rogue Climate traveled to the scoping hearing in Redding from Medford, Oregon to stand with Yurok, Hoopa Valley, Karuk, Pit River, Miwok, and Winnemem Wintu tribal members opposing the Delta Water Tunnel which would exacerbate the problems communities across the region are already seeing on our rivers. California must have meaningful consultation with all Tribal Nations impacted by this project. This project must not move forward if any impacted Tribe has said no. Governor Newsom must do what is best for the climate and listen to the indigenous peoples of these lands and stop the Delta Tunnel project for good.
466	Joanne Lee California Indian Environmental Alliance	According to AB52, the state is required to have consultation with tribes in regards to tribal cultural resources. We understand that consultation is being held, but it is not meaningful. There's no free prior informed consent. In accordance, when Governor Brown's Executive Order B6018 which requires tribals to engage in consultation with tribes in accordance with Executive Order B1011, the lack of consent in only providing information to tribes does not align with Governor Newsom's apology Executive Order 915 -- N1519 and his intended attempt at reparation with his creation of the Truth and Healing Council.
540	Cheryl Madrigal Rincon Band of Luiseño Indians	From the documents made publicly available, the Rincon Band understands that various tribal cultural resources will be impacted by the proposed project. The Band asks the DWR to further consult with local tribes to discuss the impacts on the natural habitat and access to traditional gathering areas, and cultural and natural resources. Through tribal consultation DWR needs to carefully consider the impacts to such resources and consult with tribes to establish measures that can be taken to avoid impacts to Tribal Cultural resources or to mitigate the effects.

573	Jennifer Olguin	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the livelihood and cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land. The Winnemem Wintu Tribe is spiritually connected to the Chinook Salmon
577	Alexa Kerr	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the livelihood and cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land. The Winnemem Wintu Tribe is spiritually connected to the Chinook Salmon
578	Jacob Foley	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the livelihood and cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land. The Winnemem Wintu Tribe is spiritually connected to the Chinook Salmon.
579	Genesis Mendoza	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the livelihood and cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land. The Winnemem Wintu Tribe is spiritually connected to the Chinook Salmon.
580	Diana Garcia	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
581	Rachel Huang	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
583	Lorenzo Castaneda	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.

584	Georgia Steinheimer	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
585	Phoebe Lawton	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
586	Miranda O'Brien	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
587	Jennifer Martinez	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
588	Siena Hooper	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
589	Elvia Cruz	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
590	Luis	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.

591	Cynthia Torres	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
592	Selenia	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
593	Gabriel van Praag	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
594	Arisbeth Cruz	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
595	Arushi Lakhan-Pao	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
596	Malei Guzman	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
597	Dang Nguyen	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.

599	Michelle Huang	This tunnel project will have a tremendous impact on the livelihood and culture of the Winnemem Wintu Tribe, a matrilineal Wintu-speaking community who are indigenous to the Winnemem, or McCloud River. The Chinook Salmon are an essential part of the cultural traditions of the Winnemem Wintu Tribe that takes care of the Salmon's land and is deeply and spiritually connected to the Chinook Salmon.
627	Nichelle Garcia	The ancestral lands and watersheds of the Hupa, Yurok, Karuk, Pit River and Winnemem Wintu tribes should be added to the project area, and they must be consulted as required by CEQA AB 52 as the Delta Tunnel would impact their cultural resources. The Delta Tunnel, if constructed, would be pumping water from these rivers, the flows of which have already been heavily degraded by reservoirs, diversions and hydroelectric projects.
720	Eric Gillies State Lands Commission	Tribal Engagement and Consideration of Tribal Cultural Resources. Commission staff recommends that DWR expand the discussion of Tribal engagement and consideration of Tribal cultural resources in order to demonstrate compliance with AB 52 (Gatto; Stats. 2014, ch. 532), which applies to all CEQA projects initiated after July 1, 2015.1Commissionstaff notes that the NOP does not contain sufficient information as to how DWR has complied with AB 52 provisions, which provide procedural and substantive requirements for lead agency consultation with California Native American Tribes, consideration of effects on Tribal cultural resources (as defined in Pub. Resources Code, § 21074), and examples of mitigation measures to avoid or minimize impacts to these resources. Even if no Tribe has submitted a consultation notification request for the Project area covered by the NOP, DWR should: •Contact the Native American Heritage Commission to obtain a general list of interested Tribes for the Project area •Include the results of this inquiry within the Draft EIR •Disclose and analyze potentially significant effects to Tribal cultural resources and avoid impacts when feasible Since the NOP does not disclose if notification or outreach to interested Tribes has occurred and does not document their response, Commission staff recommends that DWR include this information in the Draft EIR to maintain a clear record of DWR's efforts to comply with AB 52.
793	Rebekah Olstad	The ancestral lands and watersheds of the Hupa, Yurok, Karuk, Pit River and Winnemem Wintu tribes should be added to the project area, and they must be consulted as required by CEQA AB 52 as the Delta Tunnel would impact their cultural resources. The Delta Tunnel, if constructed, would be pumping water from these rivers, the flows of which have already been heavily degraded by reservoirs, diversions and hydroelectric projects.

804	Don Hankins, Ph.D.	As a Miwok traditional cultural practitioner, I have sought to engage in this process via government to government engagement with the Department of Water Resources, but communications with the Native American Liaison did not receive a reply. Apparently, DWR has opted to consult with AB 52 tribes and tribal organizations despite other policies which are more inclusive of consultation pursuant to HR 93-638, B-10-11, and other federal or state policies recognizing tribal self-determination and sovereignty. The limited approach to AB 52 consultation is problematic given the limitations of knowledge and input such narrow consultation may provide. As a traditional cultural practitioner I have worked with or provided comments on prior environmental reviews related to the Delta and elsewhere, and should be utilized to develop a project and analysis that avoids and minimizes impacts to cultural and ecological systems directly, indirectly, and cumulatively with any proposed project.
829	Sherri Norris California Indian Environmental Alliance	Tribes have yet to be afforded the option of meaningful consultation Tribal consultation to date has not been meaningful. As this process has unfolded it is clear that Tribes are being denied their right to free and prior informed consent, and as such this project is contrary to the Governor's stated goals to work in support of Tribal health and resiliency. According to AB52, the state is required to consult with Tribes Whenever Tribal cultural resources may be impacted. While we understand that Tribes have been invited to consult with state agencies on this project, it is our observation that these information meetings included informing Tribes that this project is going to move forward and that all decisions given to Tribes only included the same goal of removing more water from an already overdrafted and impaired river system, and of how Tribes wish to document cultural site, remove cultural objects and to move the remains of Tribal ancestors. Removal of cultural objects and remains, while paramount, is not the only intended item that should be discussed and afforded to Tribes when a project is being planned or implemented. Moving forward on a project without consent from Tribes is not in accordance with the spirit of tribes exercising tenants of "free and prior informed consent," AB52, Governor Brown's Executive Order B-60-18, federal Executive Order B-10-11, and it does not align with Governor Newsom's apology, Executive Order N-15-19, or with the creation of the Truth and Healing Council. Tribal healing is intrinsically connected to tribal members having access to their homelands, and that the environment and cultural resources of these sources of spiritual health and physical well-being are restored, or at minimum that there is no further impairment. Tribes are struggling to restore the aquatic systems that so that their members can access traditional foods, and cultural and ceremonial resources. In addition, it is worth highlighting that outreach and consultation with Tribes outside of the Project foot print area: in the source waters, through to the receiving waters of the San Francisco Bay has been largely absent.

830	Michelle Berditschevsky Mount Shasta Bioregional Ecology Center and Janie Painter Medicine Lake Citizens for Quality Environment	THE EIR SHOULD INCLUDE CULTURAL AND COMMUNITY VALUES AND NEEDS FOR NORTHERN CALIFORNIANS. ENGAGEMENT OF TRIBES AND DISADVANTAGED COMMUNITIES IN NORTHERN CALIFORNIA HAS BEEN INSUFFICIENT The State of California, through law, legislation and funding sources has prioritized tribal and disadvantaged communities throughout the state. According to the Upper Sacramento IRWM Plan, the entire region qualifies as a disadvantaged community (DAC) under DWR guidelines. However, the communities and cultural resources in the MLH have continued to struggle for protection of sacred waters. The State has a responsibility to partner with tribal communities. California tribes and tribal communities, whether federally recognized or not, have distinct cultural, spiritual, environmental, economic, and public health interests and valuable traditional cultural knowledge about California resources. According to your own policy, "DWR is committed to open, inclusive, and regular communication with tribal governments and communities to recognize and understand their needs and interests." The Medicine Lake Highlands have also been identified as being sacred to the Pit River, Klamath, Modoc, Shasta, Karuk and Wintu tribes. By not taking action to support the need to fill critical groundwater data gaps and to protect the sacred waters in the Medicine Lake Highlands, the state is doing the tribal communities and state-designated DACs a disservice. DWR recognizes that California tribes and tribal communities, whether federally recognized or not, have distinct cultural, spiritual, environmental, economic, and public health interests and valuable traditional cultural knowledge about California resources. Through their tribal policy, DWR aims to support collaboration and informed decisionmaking with tribal communities, with a specific focus on: Working to restore, protect, and manage the State's natural resources for current and future generations; Using creative approaches and solutions based on science and tribal ecological knowledge; Developing strategies for preserving California Native American tribes' water rights and providing for the sustainable management of California's sacred waters; Demonstrating a respect for all communities, resources, and interests and an open and free exchange of information. Lastly, DWR should include northern California tribal and DAC representation on the Delta Conveyance Design and Construction Authority.
853	Susan Alexander	The ancestral lands and watersheds of the Hupa, Yurok, Karuk, Pit River and Winnemem Wintu tribes should be added to the project area, and they must be consulted as required by CEQA AB 52 as the Delta Tunnel would impact their cultural resources. The Delta Tunnel, if constructed, would be pumping water from these rivers, the flows of which have already been heavily degraded by reservoirs, diversions and hydroelectric projects. As required by the UN Declaration on the Rights of Indigenous People, the Department of Water Resources must seek out the free, prior and informed consent of the tribes before greenlighting this project.
854	Isaac Kinney	Include all tribes downstream of the Trinity River watershed in tribal consultation

Appendix E
Copies of Scoping Comment Letters

This appendix is provided online at https://www.deltaconveyanceproject.com/planning-processes/california-environmental-quality-act#scoping.